UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner

v.

UNILOC 2017 LLC
Patent Owner

IPR2019-01471
PATENT 6,836,654

PATENT OWNER RESPONSE TO PETITION

TABLE OF CONTENTS

EXHIBITS

2001	Memorandum Opinion on Claim Construction, *Uniloc 2017 LLC v. Motorola Mobility, LLC*, 1-18-cv-01841 (consolidated with 1-18-cv-01844), Dkt. 72 (D. Del. Jan. 17, 2020)
2002	Claim Construction Order, *Uniloc 2017 LLC v. Motorola Mobility, LLC*, 1-18-cv-018441 (consolidated with 1-18-cv-01844), Dkt. 75 (D. Del. Jan. 23, 2020)
2003	Claim Construction Memorandum Opinion and Order, *Uniloc 2017 LLC v. Samsung Electronics America, Inc.*, 2-18-cv-00508, Dkt. 61 (E.D. Tex. Jan. 20, 2020)
2004	Order, *Uniloc 2017 LLC v. Samsung Electronics America, Inc.*, 2-18-cv-00508, Dkt. 71 (E.D. Tex. Feb. 26, 2020) (adopting magistrate's claim construction order and overruling objections)
2005	Claim Construction Memorandum Opinion and Order, *Uniloc 2017 LLC v. Google LLC*, 2-18-cv-00493, Dkt. 165 (E.D. Tex. Jan. 20, 2020)
2006	Order, *Uniloc 2017 LLC v. Google LLC*, 2-18-cv-00493, Dkt. 212 (E.D. Tex. Mar. 23, 2020) (adopting magistrate's claim construction order and overruling objections)

I.   INTRODUCTION

Uniloc 2017 LLC (the "Patent Owner" or "Uniloc") submits its Response to the Petition for *Inter Partes* Review ("Pet." or "Petition") of United States Patent No. 6,836,654 ("the '654 Patent" or "Ex. 1001") filed by Microsoft Corp. ("Petitioner") in IPR2019-01471.

In view of the reasons presented herein, the Petition fails to meet its burden of proving any challenged claim is unpatentable.

II.   THE '654 PATENT

The '654 patent is titled "Anti-theft protection for a radiotelephony device." The '654 patent issued December 28, 2004, from U.S. Patent Application No. 09/739,507 filed December 18, 2000, claiming priority to French application 99-16136, filed December 21, 1999.

Figure 3 of the '654 patent, reproduced below, is a flow chart depicting an example embodiment.
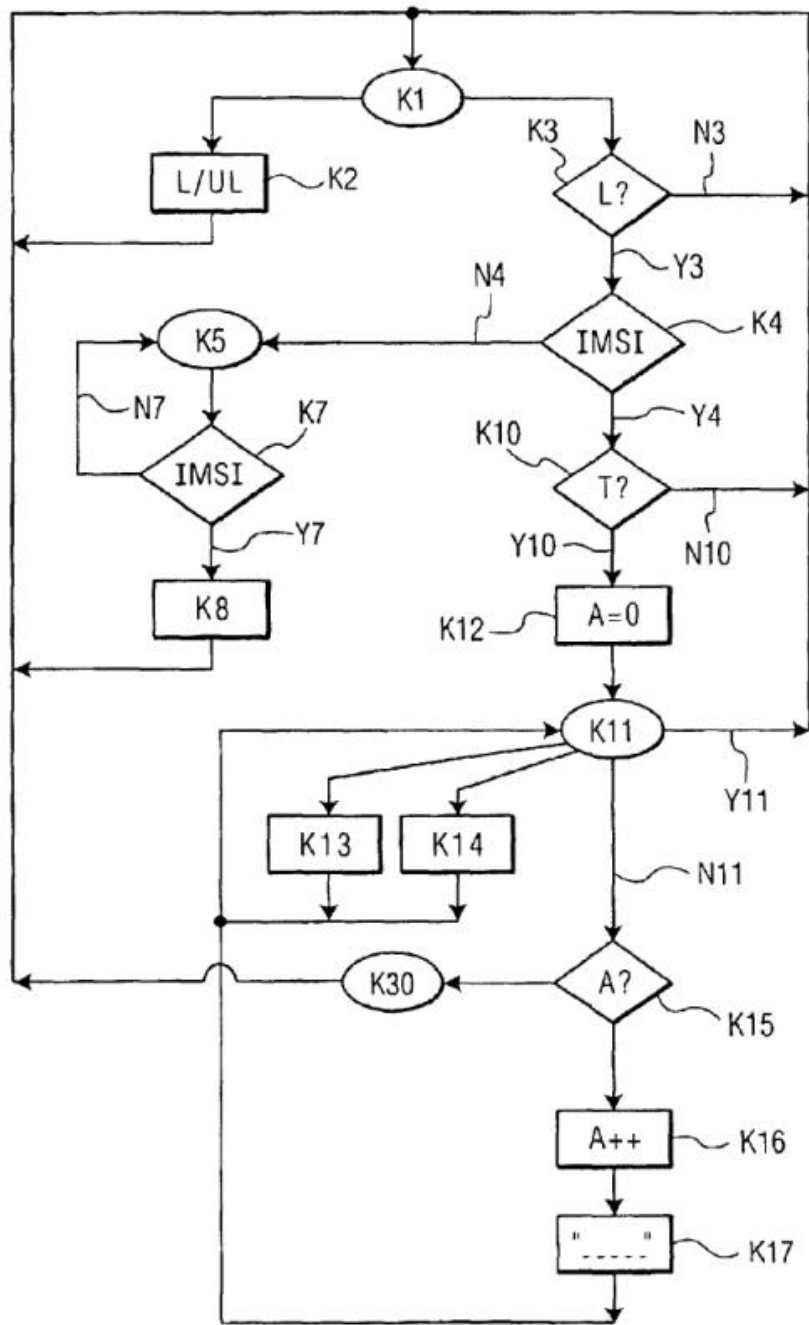
FIG. 3

The text accompanying Figure 3 describes operation from box K1 at the top
of the figure, in which the device is in a state of availability, through various blocking

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