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 PRELIMINARY RESPONSE TO PETITION
PURSUANT TO 37 C.F.R. §42.107(a)**

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I. INTRODUCTION

Uniloc 2017 LLC ("Uniloc" or "Patent Owner") submits this Preliminary Response to Petition IPR2019-01471 for *Inter Partes* Review ("Pet." or "Petition") of United States Patent No. 6,836,654 ("the '654 patent" or "EX1001") filed by Microsoft Corporation ("Petitioner"). The instant Petition is defective for at least the reasons set forth herein.

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.
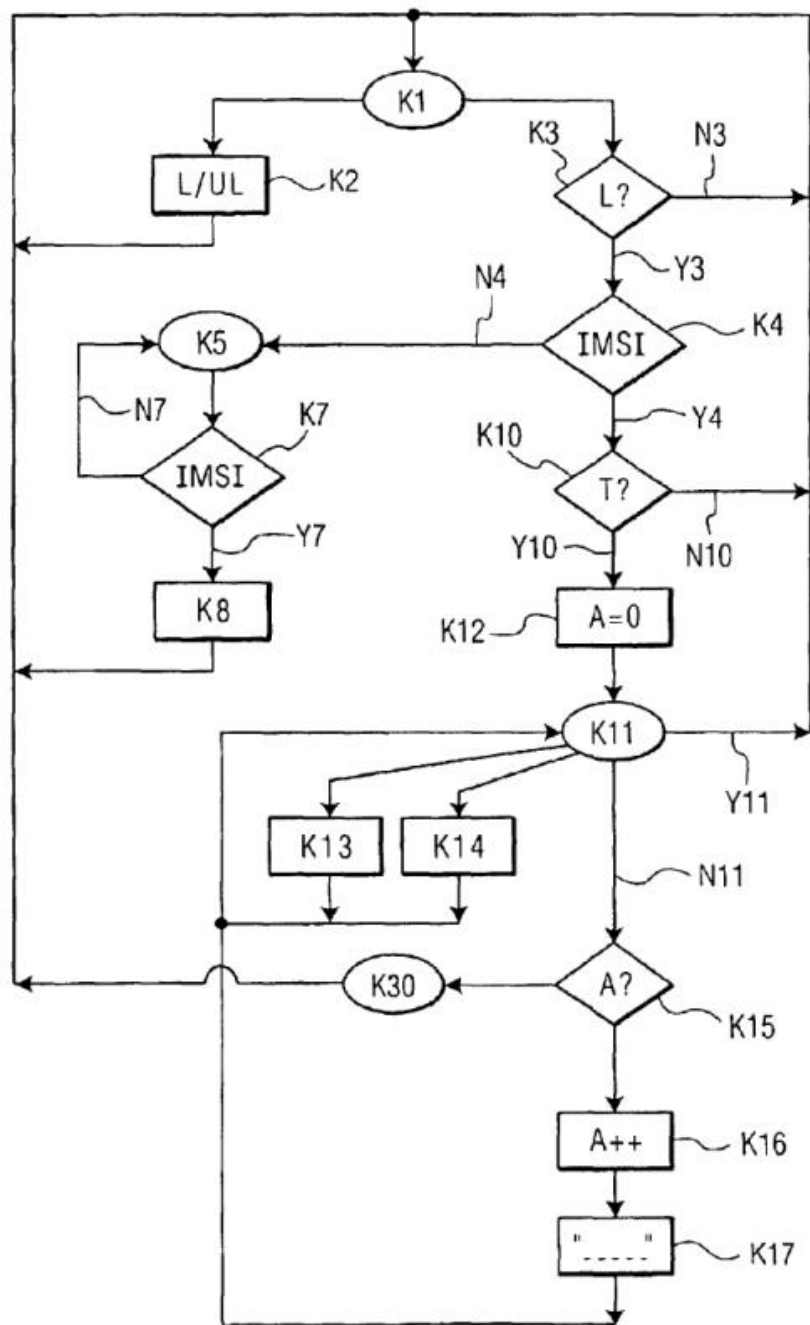
FIG. 3

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

states (K5, K11, K30) and decisional nodes related to these blocking states. *See*

EX1001, 2:61–4:6.

III. RELATED PROCEEDINGS

The following proceedings are currently pending cases concerning U.S. Pat.

No. 6,836,654 (EX1001).

Case Name	Case Number	Court	Filing Date
Uniloc 2017 LLC et al v. Google LLC	2-18-cv-00493	TXED	11/17/2018
Uniloc 2017 LLC v. Samsung Electronics America, Inc. et al	2-18-cv-00508	TXED	11/17/2018
Uniloc 2017 LLC v. Motorola Mobility, LLC	1-18-cv-01844	DED	11/20/2018
Uniloc 2017 LLC v. HTC America, Inc.	2-18-cv-01732	WAWD	11/30/2018
Uniloc USA, Inc. et al v. Apple Inc.	3-19-cv-01697	CAND	4/2/2019
Uniloc 2017 LLC v. Microsoft Corporation	8-19-cv-00781 (stayed)	CACD	4/29/2019
Samsung Electronics America, Inc. v. Uniloc 2017 LLC	IPR2019-01218	PTAB	6/19/2019
Samsung Electronics America, Inc. v. Uniloc 2017 LLC	IPR2019-01219	PTAB	6/19/2019
Microsoft Corporation v. Uniloc 2017 LLC	IPR2019-01470	PTAB	8/9/2019
Microsoft Corporation v. Uniloc 2017 LLC	IPR2019-01471	PTAB	8/9/2019

IV. THE BOARD SHOULD EXERCISE DISCRETION TO DENY INSTITUTION ON THIS CUMULATIVE PETITION

Petitions challenging claims 1–9 (IPR2019-01218) and claims 10–20

(IPR2019-01219) of the '654 patent were filed by Samsung Electronics America,

Inc. on June 19, 2019. Whether or not the Board institutes review in IPR2019-01219

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