IPR2020-00034 U.S. Patent No. 8,023,580

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., Petitioner,

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP, Patent Owner.

Case IPR2020-00034 U.S. Patent No. 8,023,580

PATENT OWNER'S PRELIMINARY RESPONSE

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B. The Office Should Decline to Institute Under 35 U.S.C. § 325(d) Because
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EXHIBIT LIST

Exhibit No.	Title
EX2001	Declaration of Nikil Jayant
EX2002	HEWLETT-PACKARD JOURNAL, Hewlett-Packard
	Company, 1998
EX2003	F. Halsall, DATA COMMUNICATIONS, COMPUTER
	NETWORKS AND OPEN SYSTEMS, Addison-
	Wesley, 1996
EX2004	A. Goldsmith, WIRELESS COMMUNICATIONS,
	Cambridge, 2005 (Excerpts)
EX2005	THE RANDOM HOUSE COLLEGE DICTIONARY
	REVISED EDITION (Excerpts)
EX2006	MERRIAM WEBSTER'S COLLEGIATE
	DICTIONARY, Merriam-Webster Incorporated, 2012
	(Excerpts)
EX2007	Opening Expert Report of Richard T. Mihran, PH.D in
	Case No. 2:19-CV-00025-JRG (E.D. Tex.)
EX2008	Docket Control Order in Case No. 2:19-CV-00025-JRG
	(E.D. Tex.)
EX2009	Claim Construction Memorandum and Order in Case No.
	2:19-CV-00025-JRG (E.D. Tex.)
EX2010	Non-Confidential Petition and Appendix for Writ of
	Mandamus in Case 20-112 (Fed. Cir.)
EX2011	Apple's Invalidity Contentions in Case No. 2:19-CV-
	00025-JRG (E.D. Tex.)

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EX2012	Ex Parte Reexamination of U.S. Patent No. 8,457,228
	(Reexamination Control No. 90/013809)
EX2013	RESERVED
EX2014	Decision Denying Institution of Inter Partes Review in
	IPR2015-00555
EX2015	Decision Denying Institution of Inter Partes Review in
	IPR2014-00889
EX2016	U.S. Patent No. 5,537,398 to Siwiak
EX2017	U.S. Patent No. 5,793,756 to Ayerst
EX2018	U.S. Patent No. 5,649,294 to Ayerst
EX2019	U.S. Patent No. 5,875,387 to Ayerst
EX2020	U.S. Patent No. 5,168,493 to Nelson et al.
EX2021	G. Held, DICTIONARY OF COMMUNICATIONS
	TECHNOLOGY, Wiley, 1998 (Excerpts)
EX2022	A. Kamerman, THROUGHPUT DENSITY
	CONSTRAINTS FOR WIRELESS LANS BASED ON
	DSSS, IEEE, 1996
EX2023	U.S. Patent No. 4,814,984 to Thompson
EX2024	U.S. Patent No. 6,640,268 to Kumar

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