

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Bernard Hunt
U.S. Patent No.: 6,868,079 Attorney Docket No.: 39521-0060IP1
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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 6,868,079 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

- Exhibit-1001 U.S. Patent No. 6,868,079 to Hunt (“the ’079 Patent”)
- Exhibit-1002 Excerpts of Prosecution History of the ’079 Patent (Serial No. 09/455,124)
- Exhibit-1003 Declaration of Paul G. Steffes, Ph.D.
- Exhibit-1004 *Curriculum Vitae* of Paul G. Steffes, Ph.D.
- Exhibit-1005 U.S. Patent No. 4,763,325 to Wolfe *et al.* (“Wolfe”)
- Exhibit-1006 U.S. Patent No. 6,298,052 to Bousquet *et al.* (“Bousquet”)
- Exhibit-1007 PCT Publication WO 1992/021214 to Patsiokas *et al.* (“Patsiokas”)
- Exhibit-1008 John L. Everett, *Very Small Aperture Terminal (VSATs)*, Institution of Electrical Engineers (IEE), Telecommunication Series 28, First Edition (1992) (“Everett”) (select portions)
- Exhibit-1009 C. Retnadhas, Satellite Multiple Access Protocol, IEEE Communications Magazine, 1980 (“Retnadhas”)
- Exhibit-1010 U.S. Patent No. 6,212,360 to Fleming, III *et al.* (“Fleming”)
- Exhibit-1011 ITU-T G.114, *Transmission Systems and Media. General Recommendations on the Transmission Quality for an Entire International Telephone Connection. One-Way Transmission Time*, Telecommunication Standardization Sector of ITU, 1994 (“ITU Standards”)

- Exhibit-1012 Joint Claim Construction and Prehearing Statement, District Court Case No. 2-18-cv-00042, (“Joint CC”)
- Exhibit-1013 Exhibit A of Joint CC (“Exh-A of Joint CC”)
- Exhibit-1014 Fredrick J. Hill & Gerald R. Peterson, Introduction to Switching Theory and Logical Design, Second Edition (1968) (select portions) (“Hill”)
- Exhibit-1015 Newton’s Telecom Dictionary, 12th Edition (1997) (select portions)
- Exhibit-1016 The IEEE Standard Dictionary of Electrical and Electronic Terms, Sixth Edition (1996) (select portions)
- Exhibit-1017 Declaration of Jacob Robert Munford

I. INTRODUCTION

Apple Inc., LG Electronics Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively “Petitioners”) petition for *Inter Partes* Review (“IPR”) of claims 17 and 18 (“the Challenged Claims”) of U.S. Patent No. 6,868,079 (“the ’079 Patent”).

II. REQUIREMENTS FOR IPR

A. Grounds for Standing

Petitioners certify that the ’079 Patent is available for IPR. Petitioners are not barred or estopped from requesting review of the Challenged Claims.

B. Challenge and Relief Requested

Petitioners request IPR of the Challenged Claims on the grounds in the table below, as explained in this petition and the Declaration of Paul G. Steffes, Ph.D. *See e.g.*, EX-1003, [1]-[147].

Ground	'079 Claims	§ 103 Basis
1	17, 18	Obvious over Wolfe in view of Bousquet and Patsiokas
2	17, 18	Obvious over Wolfe in view of Bousquet, Everett, and Patsiokas

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