

## Zhong, Annita

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**From:** Deol, Ravi <Ravi.Deol@wilmerhale.com>  
**Sent:** Friday, July 3, 2020 5:42 PM  
**To:** PanOptis\_Apple2; #Hilco/PanOptis v Apple [Int]; 'Ppm\_Apple@grayreed.com'; Sheasby, Jason; Steven J. Pollinger; Vicki Merideth; Jill Bindler  
**Cc:** WH Apple Optis Service; ~Smith, Melissa; ~Arias, Diana  
**Subject:** RE: Optis Wireless Technology, LLC, et al., v. Apple Inc., Case No. 2:19-cv-00066 (E.D. Tex.) -- § 282 Disclosure  
**Attachments:** 2020-07-03 Apple's Identification of Prior Art Pursuant to 35 USC 282.pdf

Counsel,

I'm resending the attached as I received bounce-back messages.

Best,

**Ravi Deol | WilmerHale**  
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**From:** Deol, Ravi <Ravi.Deol@wilmerhale.com>  
**Sent:** Friday, July 3, 2020 6:37 PM  
**To:** PanOptis\_Apple2@McKoolSmith.com; panoptis-Apple@irell.com; ppm\_apple@grayreed.com  
**Cc:** WH Apple Optis Service <WHAppleOptisService@wilmerhale.com>; melissa@gillamsmithlaw.com; 'Diana Arias' <diana@gillamsmithlaw.com>  
**Subject:** Optis Wireless Technology, LLC, et al., v. Apple Inc., Case No. 2:19-cv-00066 (E.D. Tex.) -- § 282 Disclosure

Counsel,

Attached for service, please find Apple Inc.'s Identification of Prior Art Pursuant to 35 U.S.C. § 282.

Have a happy and safe 4<sup>th</sup>,

**Ravi Deol\* | WilmerHale**  
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\* Not admitted to practice in Colorado. Admitted in Illinois and Texas. Practice supervised by members of the firm who are members of the Colorado bar.

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

OPTIS WIRELESS TECHNOLOGY, LLC,  
OPTIS CELLULAR TECHNOLOGY, LLC,  
UNWIRED PLANET, LLC, UNWIRED  
PLANET INTERNATIONAL LIMITED,  
AND PANOPTIS PATENT  
MANAGEMENT, LLC,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Civil Action No. 2:19-cv-00066-JRG

**JURY TRIAL DEMANDED**

**APPLE INC.'S IDENTIFICATION OF  
PRIOR ART PURSUANT TO 35 U.S.C. § 282**

Pursuant to 35 U.S.C. § 282, Defendant Apple Inc. (“Apple”) hereby provides notice of its intention to rely on the following patents, publications, and witnesses to establish prior art to U.S. Patent No. 8,005,154, U.S. Patent No. 8,019,332, U.S. Patent No. 8,385,284, U.S. Patent No. 8,411,557, U.S. Patent No. 9,001,774, and U.S. Patent No. 8,102,833, to show the state of the art, or to establish the other matters described in 35 U.S.C. § 282.

The identification of prior art references and persons does not mean that Apple will use every one of these references or present every such witness at trial. Rather, Apple has disclosed or will disclose the specific references, exhibits, and persons on which it intends to rely consistent with the rulings, directions, and procedures set forth by the Court or otherwise agreed by the parties.

In addition to the items expressly listed in this notice, Apple incorporates by reference all information set forth in the parties’ initial disclosures, expert reports, expert and fact witness depositions, the trial exhibit list, the trial witness list, the pleadings and papers on file in this matter, the written discovery and discovery responses including, without limitation, Apple’s invalidity contentions, any motions filed, and exhibits and demonstratives at trial, and the prior art identified in the prosecution histories of the asserted patents.

## I. PATENTS

No.	Country	Number	Date Issued/ Published	Patentee	Bates Range
1	U.S.	8,005,154	08/23/2011	Kwon, et al.	POAP_00003250 - POAP_00003268
2	U.S.	8,019,332	09/13/2011	Lee, et al.	POAL-00003270- POAL-00003297
3	U.S.	8,102,833	01/24/2012	Lee, et al.	POAP_00003298- POAP_00003314
4	U.S.	8,385,284	02/26/2013	Wengerter, et al.	POAP_00003316- POAP_00003340
5	U.S.	8,411,557	04/02/2013	Imamura, et al.	POAP_00003341- POAP_00003359

No.	Country	Number	Date Issued/ Published	Patentee	Bates Range
6	U.S.	9,001,774	04/07/2015	Khan	POAP_00003374- POAP_00003390
7	U.S.	6,975,615	12/13/2005	Toskala, et al.	APL-UPPO_004116083- APL-UPPO_004116100
8	U.S.	8,331,328	12/11/2012	Papasakellariou, et al.	APL-UPPO_004116101- APL-UPPO_004116115
9	U.S.	6,732,316	05/04/2004	Tong, et al.	APL-UPPO_004116074- APL-UPPO_004116082
10	U.S.	8,467,367	01/18/2003	Malladi, et al.	APL-UPPO_000582721- APL-UPPO_000582748
11	U.S.	2006/0262871	11/23/2006	Cho	APL-UPPO_000580549- APL-UPPO_000580565
12	U.S.	6,421,527	07/16/2002	DeMartin, et al.	APL-UPPO_004116067- APL-UPPO_004116073
13	U.S.	Publication No. 2008/0304467	12/11/2008	Papasakellariou, et al.	APL-UPPO_004115158- APL-UPPO_004115173
14	U.S.	2003/0185159	10/02/2003	Seo, et al.	APL-UPPO_004115077- APL-UPPO_004115110
15	U.S.	Publication No. 2006/0098568	05/11/2006	Oh, et al.	APL-UPPO_004115111- APL-UPPO_004115120
16	U.S.	8,374,161	02/12/2013	Malladi	APL-UPPO_000582655- APL-UPPO_000582682
17	U.S.	Publication No. 2007/0097901	05/03/2007	Tirkkonen et al.	APL-UPPO_004115121- APL-UPPO_004115133
18	U.S.	Publication No. 2007/0149206	06/28/2007	Wang et al.	APL-UPPO_004115134- APL-UPPO_004115144
19	U.S.	Publication No. 2010/0067495	03/18/2010	Lee et al.	APL-UPPO_004115174- APL-UPPO_004115187
20	U.S.	Publication No. 2007/0254656	11/01/2007	Dalsgaard	APL-UPPO_004115145- APL-UPPO_004115157
21	U.S.	Publication No. 2010/0260140	10/14/2010	Zhu	APL-UPPO_004115188- APL-UPPO_004115201
22	U.S.	6,188,717	02/13/2001	Kaiser, et al.	APL-UPPO_004116048- APL-UPPO_004116066
23	PCT	Publication No. WO2005/002103A1	01/06/2005	Murakami et al.	APL-UPPO_000583205- APL-UPPO_000583267
24	PCT	Publication No. WO2005/002103A1 (Japanese)	01/06/2005	Murakami et al.	APL-UPPO_000583387- APL-UPPO_000583465
25	U.S.	Publication No. 2002/0012380A1	01/31/2002	Hottinen et al.	APL-UPPO_000580657- APL-UPPO_000580674
26	U.S.	Publication No. 2008/0313521	12/18/2008	Frederiksen et al.	APL-UPPO_000573530- APL-UPPO_000573541

No.	Country	Number	Date Issued/ Published	Patentee	Bates Range
27	U.S.	Publication No. 2006/0227789	10/12/2006	Dottling et al.	APL-UPPO_000572647- APL-UPPO_000572667
28	U.S.	7,426,201	09/16/2008	Kim et al.	APL-UPPO_000575151- APL-UPPO_000575171
29	U.S.	Publication No. 2007/0177569	08/02/2007	Lundby	APL-UPPO_000576852- APL-UPPO_000576880
30	U.S.	8,645,786	02/04/2014	Michel et al.	APL-UPPO_000576895- APL-UPPO_000576906
31	U.S.	8,363,624	01/29/2013	Blanz et al.	APL-UPPO_000571344- APL-UPPO_000571365
32	U.S.	6,304,991	10/16/2001	Rowitch et al.	APL-UPPO_000581186- APL-UPPO_000581198
33	U.S.	8,401,542	03/19/2013	Chung et al.	APL-UPPO_000582024- APL-UPPO_000582055
34	U.S.	7,873,004	01/18/2011	Lee et al.	APL-UPPO_002497782- APL-UPPO_002497809
35	U.S.	Publication No. 2009/0238091	09/24/2009	Kim, et al.	APL-UPPO_003009229- APL-UPPO_003009253
36	U.S.	7,016,925	03/21/2006	Schmidt	APL-UPPO_004114087- APL-UPPO_004114125
37	U.S.	Publication No. 2007/0192655	08/16/2007	Nagaraj	APL-UPPO_004178655- APL-UPPO_004178669
38	U.S.	8,009,637	08/30/2011	Harris et al.	APL-UPPO_000581861- APL-UPPO_000581872
39	U.S.	Publication No. 2007/0165567	07/19/2007	Tan et al.	APL-UPPO_004121642- APL-UPPO_004121662
40	U.S.	8,000,305	08/16/2011	Tan et al.	APL-UPPO_000581840- APL-UPPO_000581860
41	U.S.	2006/0018336	01/26/2006	Sutivong et al.	APL-UPPO_000580949- APL-UPPO_000580966
42	PCT	Publication No. WO2006/019710	02/23/2006	Sutivong et al.	POAP_00017046- POAP_00017083

## II. PUBLICATIONS<sup>1</sup>

No.	Title, Author	Date	Pages	Bates Range
1	Wells, Multi-Gigabit Microwave and Millimeter-Wave: Wireless Communications (Artech House, Boston 2010)	2010	All	APL-UPPO_004115688- APL-UPPO_004115963
2	3GPP TS 36.211 V2.0.0 (2007-09)	09/24/2007	All	APL-UPPO_000565723- APL-UPPO_000565771

<sup>1</sup> Apple incorporates by reference the opening reports of its experts to establish the public availability of 3GPP and ETSI materials.

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