UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC. Petitioner,

v.

OPTIS WIRELESS TECHNOLOGY, LLC Patent Owner.

Case IPR2020-00466 Patent No. 8,411,557

PATENT OWNER'S PRELIMINARY RESPONSE

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	В.	Fintiv Factor #2: the court's trial date is one month before the Board's projected institution date and 13 months before Board's projected statutory deadline for a final written decision		
	C.	Fintiv Factor #3: There has been immense "investment in the parallel proceeding by the court and parties."		
	D.	Fintiv Factor #4: There is complete "overlap between issues raised in the petition and in the parallel proceeding."		
	E.	Fintiv Factor #5: "The petitioner and the defendant in the parallel proceeding are the same party."		
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