

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INCORPORATED

Petitioner

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP

Patent Owner

CASE NO. IPR2020-00510

U.S. PATENT 8,023,580

**PETITIONER'S REPLY TO
PATENT OWNER'S PRELIMINARY RESPONSE**

PETITIONER’S EXHIBIT LIST

No.	Description
1001	U.S. Patent No. 8,023,580 (“580 Patent”)
1002	Declaration of Dr. John Villasenor (“Villasenor Decl.”)
1003	U.S. Patent No. 6,132,306 (“Trompower”)
1004	U.S. Patent No. 5,029,183 (“Tymes”)
1005	U.S. Patent No. 5,491,832 (“Malkamaki”)
1006	U.S. Patent No. 8,457,228 (“228 Patent”)
1007	U.S. Patent No. 5,950,124
1008	Theodore S. Rappaport, <i>Wireless Communications: Principles & Practice</i> (“Rappaport”)
1009	Fuqin Xiong, <i>Digital Modulation Techniques</i> (“Xiong”)
1010	U.S. Patent No. 5,381,449
1011	U.S. Patent No. 5,909,469 (“Frodigh”)
1012	U.S. Patent No. 5,533,004 (“Jasper”)
1013	Sanjay Udani et al., <i>Power Management in Mobile Computing (a Survey)</i> (“Udani”)
1014	Huajing Fu et al., <i>Experimental Test and Evaluation of a GMSK Chipset Compatible With the GSM and PCS Standards</i> (“Fu”)
1015	Amit Bodas et al., <i>Low Complexity GSM Modulator for Integrated Circuit Implementations</i> (“Bodas”)
1016	Robert K. Morrow, <i>Bluetooth: Operation and Use</i> (“Morrow”)
1017	Jennifer Bray et al., <i>Bluetooth: Connect Without Cables</i> (“Bray”)
1018	Kursat Tekbiyik, <i>Robust and Fast Automatic Modulation Classification With CNN Under Multipath Fading Channels</i> (“Tekbiyik”) and Declaration of Jason Guerrero Regarding Tekbiyik
1019	File Wrapper, U.S. Patent No. 8,023,580 (“580 Patent”)
1020	IPR2014-00514, Briefing and Decisions
1021	IPR2014-00515, Briefing and Decisions

No.	Description
1022	IPR2014-00518, Briefing and Decisions
1023	IPR2015-00519, Briefing and Decisions
1024	IPR2015-00114, Briefing and Decisions
1025	IPR2015-00118, Briefing and Decisions
1026	OMITTED
1027	Reexamination No. 90/013,808 File History
1028	<i>Rembrandt Wireless Technologies, LP v. Samsung Electronics Co.</i> , Claim Construction Order
1029	<i>Rembrandt Wireless Technologies, LP v. Apple Inc.</i> , Claim Construction Order
1030	<i>Rembrandt Wireless Technologies, LP v. Samsung Electronics Co.</i> , Trial Transcript
1031	<i>Rembrandt Wireless Technologies, LP v. Samsung Electronics Co.</i> , Rembrandt's Appeal Brief
1032	<i>Rembrandt Wireless Technologies, LP v. Broadcom Inc.</i> , Order Denying Motion to Dismiss
1033	Affidavit of Christopher Butler regarding Exhibit 1013
1034	Declaration of Gerard P. Grenier regarding Exhibit 1015
1035	Declaration of William Johnson regarding Exhibits 1008, 1009, and 1017
1036	Declaration of Mike Strawn regarding Exhibit 1015
1037	Declaration of Stacy Troubh regarding Exhibits 1014 and 1016
1038	OMITTED
1039	Specification of the Bluetooth System v2.1 ("Bluetooth Specification") and Declaration of Jason Guerrero Regarding Bluetooth Specification
1040	Reexamination No. 90/007,617 File History
1041	OMITTED
1042	OMITTED
1043	OMITTED

No.	Description
1044	OMITTED
1045	OMITTED
1046	OMITTED
1047	OMITTED
1048	OMITTED
1049	OMITTED
1050	OMITTED
1051	IPR2020-00033, Petition
1052	IPR2020-00034, Petition
1053	OMITTED
1054	OMITTED
1055	Curriculum vitae of Dr. John Villasenor
1056	ITU website for ITU-T Recommendation V.22
1057	ITU-T Recommendation V.22
1058	ITU website for ITU-T Recommendation V.34
1059	ITU-T Recommendation V.34
1060	ITU website for ITU-T Recommendation V.27bis
1061	ITU-T Recommendation V.27bis
1062	ITU website for ITU-T Recommendation V.110
1063	ITU-T Recommendation V.110
1064	ITU website for ITU-T Recommendation V.120
1065	ITU-T Recommendation V.120
1066	Second Declaration of John Villasenor, Ph.D.

Petitioner files this Reply to the Patent Owner Preliminary Response (POPR) to address construction of “addressed for an intended destination.” *See* Paper 10 at 26-29, 56-61. Patent Owner (“PO”) seeks a construction that is far narrower than the plain language, but relies on specification examples rather than any redefinition or disclaimer. The limitation should instead be construed according to its plain and ordinary meaning, which is supported by both the intrinsic record—*e.g.*, a distinctly narrower formulation of the feature in a related patent—and by extrinsic evidence—*e.g.*, standards referenced in the ’580 Patent that are applicable to complex networks.

I. The Plain Language Allows Various Types of Destinations

Claims 1 and 58 recite “[a] communication device *capable of* communicating according to a master/slave relationship in which a slave communication from a slave to a master occurs in response to a master communication from the master to the slave” (emphasis added). “[A] transceiver, in the role of the master . . . [is] for sending at least transmissions [or “configured to transmit messages”] . . . [and] *at least one* group of transmission sequences [or “message”] is *addressed for an intended destination*” (emphasis added).

II. Petitioner Seeks to Narrow “An Intended Destination” To One Trib

Petitioner seeks to construe the phrase as “the address of the slave/trib transceiver that the master seeks to communicate with.” POPR at 26. On its face, this would seem to include communications with *any* trib. But Petitioner applies

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.