Filed on behalf of Rembrandt Wireless Technologies, LP

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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QUALCOMM INCORPORATED
Petitioner,

v.

REMBRANDT WIRELESS TECHNOLOGIES, LP
Patent Owner.

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Case IPR2020-00510
U.S. Patent No. 8,023,580

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

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LIST OF CITED EXHIBITS

Exhibit No.	Description	Filed By
1001	U.S. Patent No. 8,023,580	Petitioner
1027	Reexamination No. 90/013,808 File History	Petitioner
2007	Transcript of Telephonic Hearing dated July 16, 2020	Patent Owner

TABLE OF AUTHORITIES

<u>**CASES**</u>

I. The Claim Language "Intended Destination" Is Limited To A Slave/Trib

The parties dispute the meaning of "addressed for an intended destination."[1] This dispute is the result of Petitioner's tortured mapping of Trompower's "mobile device" as "the master and a base station as the slave or trib" (EX2007, 4:23-5:2) resulting in multiple masters (mobile terminals) associated with a single slave/trib (base station). Thus, Petitioner cannot prevail unless the "intended destination" phrase is given an overly broad construction that would include the claimed transceiver in the role of *master* (*e.g.*, Trompower's mobile terminal) communicating with *another master* (*e.g.*, another mobile terminal). Notably, neither Patent Owner, any prior patent challenger nor any district court has *ever* construed or applied the "intended destination" limitation in the '580 Patent to encompass the destination of communications from a master to another *master*, or to any device other than a slave/trib.

When properly construed in light of the intrinsic evidence, the meaning of "intended destination" requires that it be limited to a *slave/trib*. *See* POPR 26-29; EX1001 *passim*. To conclude otherwise ignores that the '580 invention, as described

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[1] Patent Owner also disputes that Petitioner has shown the cited art would have suggested the "modulation methods of a different type," "master/slave relationship" or the "reversion" limitations. POPR 15-26; 31-72.

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