

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC., APPLE INC., and
MOTOROLA MOBILITY LLC
Petitioner

v.

UNILOC 2017 LLC
Patent Owner

IPR2020-00701
Patent No. 6,836,654

MOTION FOR JOINDER TO *INTER PARTES* REVIEW IPR2019-01471

TABLE OF CONTENTS

	Page
I. STATEMENT OF THE PRECISE RELIEF REQUESTED	1
II. STATEMENT OF MATERIAL FACTS	2
III. STATEMENT OF REASONS FOR RELIEF REQUESTED	4
A. Legal Standard.....	4
B. This Joinder Motion is Timely	4
C. Each of the Factors Weighs in Favor of the Board Granting the Motion for Joinder.....	5
1. Joinder with the Microsoft IPR Is Appropriate	5
2. Petitioners Do Not Propose New Grounds of Unpatentability.....	6
3. Joinder Will Not Negatively Impact the Microsoft IPR Trial Schedule	7
4. Procedures to Simplify Briefing and Discovery	8
IV. CONCLUSION.....	9

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Biotronik, Inc. v. Atlas IP LLC</i> , IPR2015-00534, Paper 10 (PTAB Feb. 25, 2015).....	5
<i>Dell, Inc. v. Network-1 Security Solutions, Inc.</i> , IPR2013-00385, Paper 17 (July 29, 2013)	4
<i>HTC v. Parthenon Unified Memory Architecture LLC.</i> , IPR2017-00512, Paper No. 12 (June 1, 2017).....	1
<i>LG v. Memory Integrity, LLC.</i> , IPR2015-01353, Paper No. 11 (Oct. 5, 2015)	5, 6, 7, 9
<i>Microsoft Corporation v. Uniloc 2017 LLC</i> , IPR2019-01471	1
<i>Noven Pharmaceuticals, Inc. v. Novartis AG</i> , IPR2014-00550, Paper No. 38 (Apr. 10, 2015).....	9
<i>Par Pharmaceutical, Inc. v. Novartis AG</i> , IPR2016-01023, Paper No. 20 (Oct. 27, 2016)	6
<i>Samsung Elecs. Co., Ltd. v. Raytheon Co.</i> , IPR2016-00962, Paper No. 12 (Aug. 24, 2016)	5
<i>Taiwan Semiconductor Mfg. Co., Ltd. v. Zond LLC</i> , IPR2014-00781 and IPR2014-782, Paper 5 at 3	4
Statutes	
35 U.S.C. § 315(c)	1, 4
Other Authorities	
37 C.F.R. § 42.1(b)	1, 6
37 C.F.R. § 42.22	1
37 C.F.R. § 42.122(b)	1, 4

TABLE OF AUTHORITIES
(continued)

	Page(s)
Frequently Asked Question ("FAQ") H5, <i>available at</i> http://www.uspto.gov/ip/boards/bpai/prps.jsp (last visited Dec. 2, 2019)	4

I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Samsung Electronics America, Inc., Apple Inc., and Motorola Mobility LLC (“Petitioners”) respectfully submit this Motion for Joinder, concurrently with a Petition (“the Parties’ Petition”) for *inter partes* review of U.S. Patent No. 6,836,654 (“the ’654 patent”), filed herewith.

Pursuant to 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22 and 42.122(b), Petitioners request institution of an *inter partes* review and joinder with *Microsoft Corporation v. Uniloc 2017 LLC*, IPR2019-01471 (“the Microsoft IPR” or “the Microsoft proceeding”), which the Board instituted on February 11, 2020, concerning the same claims 10-20 of the ’654 patent at issue in the Parties’ Petition. This request is being submitted within the time set forth in 37 C.F.R. § 42.122(b).

Petitioners submit that the request for joinder is consistent with the policy surrounding *inter partes* reviews, as it is the most expedient way “to secure the just, speedy, and inexpensive resolution of every proceeding.” *See* 37 C.F.R. § 42.1(b); *see also HTC v. Parthenon Unified Memory Architecture LLC.*, IPR2017-00512, Paper No. 12 at 5-6 (June 1, 2017). The Parties’ Petition and the Microsoft IPR are substantially identical; they contain the same grounds (based on the same prior art combinations and supporting evidence) against the same claims. (*See* Ex. 1016, illustrating changes between the Parties’ Petition and the Petition in IPR2019-01471.) Further, upon joining the Microsoft proceeding, Petitioners will act as an

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