

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

UNILOC 2017 LLC
Patent Owner.

U.S. Patent No.: 6,836,654

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,836,654 (CLAIMS 10-20)**

TABLE OF CONTENTS

LIST OF EXHIBITSv

MANDATORY NOTICES UNDER 37 C.F.R. § 42.8vi

 1. Real Party-In-Interestvi

 2. Related Matters.....vi

 3. Lead And Back-Up Counsel, And Service Information viii

I. INTRODUCTION 1

II. GROUNDS FOR STANDING PER SECTION 42.104 (A).....2

III. IDENTIFICATION OF CHALLENGE2

 A. Statement Of The Precise Relief Requested / Statutory Grounds.....2

 B. No Examiner Addressed These Unpatentability Grounds3

 C. Petitioner’s Petition Should Be Granted Despite Samsung’s
 Previous Petitions Challenging The Same Patent5

IV. THE ’654 PATENT 7

 A. Admitted Prior Art.....7

 B. The ’654 Patent’s Specification8

 C. The Prosecution History9

V. LEVEL OF SKILL IN THE ART10

VI. CLAIM CONSTRUCTION 11

VII. GROUND 1: CLAIMS 10-20 ARE UNPATENTABLE AS
OBVIOUS OVER THE NOKIA MANUAL + BARVESTEN13

 A. Nokia 13

 B. Barvesten 13

 C. Motivation And Rationale To Combine Nokia and Barvesten15

D.	Claim 10	16
	(1) a first blocking state for when the linked user identification module is not inserted,	29
	(2) a second blocking state for when the device is inactive for a certain period of time, and	29
	(3) a third blocking state for when an incorrect deblocking code is entered too many times.	29
E.	Claim 11	31
F.	Claim 12	34
G.	Claim 13	35
H.	Claim 14	36
I.	Claim 15	38
J.	Claim 16	42
K.	Claims 17-20	44
VIII.	GROUND 2: CLAIMS 10-20 ARE UNPATENABLE AS OBVIOUS OVER BARVESTEN IN VIEW OF SCHULTZ.....	47
A.	Schultz	48
B.	Motivation And Rationales To Combine Barvesten And Schultz.....	48
C.	Claim 10	50
D.	Claim 11	60
E.	Claim 12	61
F.	Claim 13	62
G.	Claim 14	62
H.	Claim 15	64
I.	Claim 16	66

J. Claims 17-2067

IX. NO OBJECTIVE INDICIA OF NON-OBVIOUSNESS.....70

X. CONCLUSION.....71

CERTIFICATE OF COMPLIANCE.....72

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Apple Inc. v. Uniloc 2017 LLC</i> , IPR2018-00580, Paper 13 (Aug. 21, 2018).....	6
<i>Celltrion, Inc. v. Genetech, Inc.</i> , IPR2018-01019, Paper 11 (Oct. 30, 2018)	6
<i>General Plastic Industrial Co. v. Canon Kabushiki Kaisha</i> , IPR2016-01357, Paper 19 (Sept. 6, 2017).....	5
<i>Huawei Device Co., Ltd. v. Uniloc Luxembourg SA</i> , IPR2017-02090, Paper 9 (Mar. 6, 2018)	6
<i>Intex Recr. Corp. v. Team Worldwide Corp.</i> , IPR2018-00871, Paper 14 (PTAB Sept. 14, 2018).....	4
<i>Microsoft Corp. v. Parallel Networks</i> , IPR2015-00486, Paper 10, 2015 WL 4760578	4
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005) (<i>en banc</i>)	11
Statutes	
35 U.S.C. §§ 102(a), (b).....	13, 48
35 U.S.C. § 103	2
35 U.S.C. § 325(d)	3, 4
Other Authorities	
37 C.F.R. § 42.104	2
37 C.F.R. § 42.15(a).....	2
83 Fed. Reg. 51340	11

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.