

Filed on behalf of: Philip Morris Products, S.A.

Entered: September 18, 2020

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PHILIP MORRIS PRODUCTS, S.A.,
Petitioner,

v.

RAI STRATEGIC HOLDINGS, Inc.,
Patent Owner.

Case IPR2020-00919
Patent 9,901,123

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

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STATUTES

28 U.S.C. § 16597

Exhibit List

Ex.	Description
1001	U.S. Patent No. 9,901,123 (“the ’123 patent”)
1002	File History for U.S. Patent No. 9,901,123
1003	Declaration of Dr. Seetharama C. Deevi in Support of Petition for <i>Inter Partes</i> Review of ’123 Patent (“Deevi Decl”)
1004	Curriculum Vitae of Dr. Seetharama C. Deevi
1005	U.S. Patent No. 5,249,586 (“Morgan”)
1006	U.S. Patent No. 4,947,874 (“Brooks”)
1007	U.S. Patent Application Publication No. 2007/0102013 (“Adams”)
1008	U.S. Patent No. 5,144,962 (“Counts-962”)
1009	U.S. Patent No. 5,060,671 (“Counts-671”)
1010	<i>Chemical and Biological Studies on New Cigarette Prototypes that Heat Instead of Burn Tobacco</i> , R. J. Reynolds Tobacco Company Monograph (1988) (“RJR’s 1988 Monograph”) (markings on exhibit appeared in the used copy purchased by counsel)
1011	U.S. Patent No. 5,692,525 (“Counts-525”)
1012	U.S. Patent No. 5,095,921 (“Losee”)
1013	U.S. Patent No. 5,591,368 (“the ’368 patent”)
1014	International Patent Application Publication No. WO 96/32854 (“Baggett”)
1015	Korean Patent No. 10-0636287 (“Park”) (including certified English translation and original Korean version of patent)
1016	Philip Morris Incorporated Invention Record (submitted May 19, 1994; witnessed May 23, 1994) (“May 1994 Invention Record”)
1017	U.S. Patent No. 4,510,950 (“Keritsis”)

Ex.	Description
1018	Steven M. Kaplan, Wiley Electrical and Electronics Engineering Dictionary (2004)
1019	IEEE 100, The Authoritative Dictionary of IEEE Standards Terms (7th ed. 2000) ("IEEE Dictionary")
1020	Philip Morris Incorporated Invention Record (dated October 11, 1988) ("October 1988 Invention Record")
1021	U.S. Patent No. 2,104,266 ("McCormick")
1022	U.S. Patent No. 5,865,185 ("Collins")
1023	U.S. Patent Application Publication No. 2007/0215167 ("Crooks")
1024	U.S. Provisional Application Serial No. 60/722,036
1025	Patent Owner's infringement chart for '123 patent, <i>In the Matter of Certain Tobacco Heating Articles and Components Thereof</i> , Inv. No. ____, EDIS Doc. ID 707369 (Filed Apr. 9, 2020) ("Infringement Chart")
1026	U.S. Patent No. 5,498,855 ("the '855 patent")
1027	Modern Dictionary of Electronics (7th ed., 1999) (excerpt)
1028	Merriam-Webster's Collegiate Dictionary (10th ed., 2001) (excerpt)
1029	Concise Oxford English Dictionary (11th ed., 2008) (excerpt)
1030	The Lady Smokes, www.theladysmokes.com (archived at web.archive.org, 2006-2007)
1031	Chambers Dictionary of Science and Technology (1999) (excerpt)
1032	Complaint for Patent Infringement, <i>RAI Strategic Holdings, Inc. v. Altria Client Services</i> , No. 1:20-cv-393 (E.D. Va. April 9, 2020)
1033	Document Filing Report for <i>In the Matter of Certain Tobacco Heating Articles and Components Thereof</i> , No. 337-TA-1199 (ITC filed April 9, 2020)

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