UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC., Petitioner,

v.

TELEFONAKTIEBOLAGET LM ERICSSON, Patent Owner

> IPR2022-00337 U.S. Patent No. 10,454,655

PATENT OWNER PRELIMINARY RESPONSE

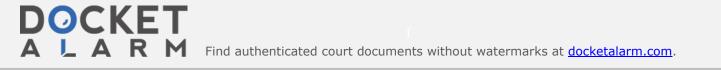


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1. Bao alone does not render obvious the claimed requirement for first and second LCIDs associated with first and second MAC CE formats with first and second bit map sizes, respectively (claim elements [21b], [26d], [31b], and [36d])
a. Bao is consistent across all embodiments that there is one specific LCID associated with the activation/deactivation MAC CE13
b. The cited portion of Bao already teaches a solution to indicate the length of a MAC CE – that does not involve using different LCIDs14
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d. The cited portion of Bao does not disclose using "activation/deactivation" MAC CEs with bit maps of different sizes18
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3. For similar reasons, neither Bao alone, nor Bao combined with Feuersanger, renders obvious claim elements [21e] and [26g]23
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E. Petitioner's Analysis of Independent Claims 1, 7, 13, and 17 Lacks Particularity and is Defective

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B. Kwon Fails to Render Obvious Claims 21-40
1. Kwon does not disclose or render obvious the claimed requirement for first and second LCIDs associated with first and second MAC CE formats with first and second bit map sizes, respectively (claim elements [21b], [26d], [31b], and [36d])
 a. LCID is used in Kwon only to identify a MAC CE as an activation/deactivation indicator MAC CE, not to indicate a bit map length. 33
b. Petitioner's focus on other types of LCIDs contradicts its position36
c. Kwon consistently teaches that a wireless communication system uses a fixed-size bit map based on a maximum number of component carriers37
d. Summary – Kwon does not disclose or render obvious first and second LCIDs associated with first and second MAC CE formats with first and second bit map sizes, respectively
 For similar reasons, Kwon does not render obvious claim elements [21e], [26g]40
C. Petitioner's Analysis of Claims 1, 7, 13, and 17 Lacks Particularity and Is Defective
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PATENT OWNER'S EXHIBIT LIST

Ex. 2001	Declaration of Dr. Zygmunt Haas, Ph.D.
Ex. 2002	Curriculum Vitae of Dr. Zygmunt Haas

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