UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD APPLE INC., Petitioner v. TELEFONAKTIEBOLAGET LM ERICSSON, Patent Owner IPR2022-00338 U.S. Patent 8,995,357

PATENT OWNER'S PRELIMINARY RESPONSE



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VII.	THE BOARD SHOULD DENY INSTITUTION BECAUSE PETITIONER FAILS TO DEMONSTRATE A REASONABLE LIKELIHOOD OF PREVAILING ON ANY CHALLENGED CLAIM		
	A.	Lee-746, Lee 668, and the Samsung Liaison document, even when combined, do not render obvious "using an indicator in each subframe to indicate that the subframe carries system information" (all claims, all grounds).	
		1. A POSITA would not combine the Samsung Liaison document with Lee-746/Lee-668 to reach the proposed combination.	29
		2. Even if combined as proposed, none of Lee-746, Lee-668, or the Samsung Liaison document, individually or as combined, teach the claimed indicator.	34
	В.	Lee-746, Lee-668, and the Samsung Liaison document, even when combined, do not render obvious "a System Information Radio Network Temporary Identifier (SI-RNTI)" (claims 1, 10, 12, 15, 21)	40
		1. The '357 Patent specification and the Office recognize that the claimed SI-RNTI is distinct from other RNTIs	40
		2. The Samsung Liaison document's "BCCH RNTI" does not render obvious the claimed "SI-RNTI."	42
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Patent Owner's Preliminary Response

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