

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Janne Peisa, et al.
U.S. Patent No.: 10,484,915 Attorney Docket No.: 50095-0070IP1
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Filing Date: December 6, 2018
Title: Identifying a beam for accessing a target cell of a wireless handover

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 10,484,915 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

- EX-1001 U.S. Patent No. 10,484,915 to Janne Peisa, et al. (“’915 patent”)
- EX-1002 Excerpts from the Prosecution History of the ’915 Patent (“Prosecution History”)
- EX-1003 Declaration of Dr. Zhi Ding
- EX-1004 Curriculum Vitae of Dr. Zhi Ding
- EX-1005 U.S. Patent Application Publication No. 2017/0251460 to Agiwal et al. (“Agiwal”)
- EX-1006 U.S. Provisional Patent Application No. 62/300,333 of Agiwal (“Agiwal-Prov1”)
- EX-1007 RESERVED
- EX-1008 3GPP TS 36.331 V12.10.0 (2016-06), 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA); Radio Resource Control (RRC); Protocol specification (Release 12) (“TS36.331”)
- EX-1009 International Application Publication No. WO 2014/078676 to Murray et al. (“Murray”)
- EX-1010 U.S. Patent Application Publication No. 2018/0115990 to Abedini et al. (“Abedini”)
- EX-1011 U.S. Provisional Patent Application No. 62/411,400 of Abedini (“Abedini-Prov1”)
- EX-1012 RESERVED

- EX-1013 Declaration of Friedhelm Rodermund
- EX-1014 RESERVED
- EX-1015 Qiu, L., Huang, Y. and Zhu, J., “Fast acquisition scheme and implementation of PRACH in WCDMA system,” *IEEE 54th Vehicular Technology Conference. VTC Fall 2001. Proceedings* (Cat. No. 01CH37211) (Vol. 3, pp. 1701-1705). IEEE.
- EX-1016 K. Dimou et al., “Handover within 3GPP LTE: Design Principles and Performance,” *2009 IEEE 70th Vehicular Technology Conference Fall*, Anchorage, AK, USA, 2009, pp. 1-5, doi: 10.1109/VETEFCF.2009.5378909
- EX-1017 A. Ghosh et al., “Random Access Design for UMTS Air-Interface Evolution,” *2007 IEEE 65th Vehicular Technology Conference - VTC2007-Spring*, 2007, pp. 1041-1045, doi: 10.1109/VETECS.2007.222

Apple Inc. (“Petitioner” or “Apple”) petitions for Inter Partes Review (“IPR”) of claims 1-15 (“Challenged Claims”) of U.S. Patent No. 10,484,915 (“’915 patent”).

I. REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104

A. Grounds for Standing Under 37 C.F.R. § 42.104(a)

Apple certifies that the ’915 Patent is available for IPR. Apple is not barred or estopped from requesting this review.

B. Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested

Apple requests an IPR of the Challenged Claims on the 35 U.S.C. § 103 grounds below. Additional explanation and support for each ground of rejection is provided in the Declaration of Dr. Zhi Ding (*see* EX-1003, ¶¶20-258), referenced throughout this Petition.

Ground	’915 Patent Claims	103 Basis
Ground 1	1-3, 6	Agiwal in view of TS36.331
Ground 2	8-10, 13-15	Agiwal in view of TS36.331 and Murray
Ground 3	1-5, 7-12, 14-15	Abedini

As shown below, each reference pre-dates November 4, 2016 (“Critical Date”), which is the earliest date to which the ’915 patent claims priority.¹

¹ Petitioner does not concede that the ’915 Patent is entitled to the claimed priority.

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