UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

BILLJCO LLC,

Patent Owner

CASE: IPR2022-00426

U.S. PATENT NO. 8,761,804

PATENT OWNER'S SURREPLY



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Williamson v. Citrix Online, LLC, 792 F.3d 1339 (Fed. Cir. 2015)
Other Authority
35 U.S.C. § 3125
All emphasis supplied unless otherwise noted.



TABLE OF EXHIBITS

Exhibit	Description
2001	Memorandum Opinion & Order Denying the Motion to
	Transfer Venue of Defendants Hewlett Packard Enterprise
	Co., Aruba Networks, LLC and Cisco Systems, Inc., Filed
	February 16, 2022 (E.D. Tex.)
2002	Memorandum Opinion & Order Denying Apple Inc.'s
	Motion to Transfer Venue filed February 24, 2022 (Public
	Version) (W.D. Tex)
2003	LegalMetric District Report Texas Western District Court in
	Patent Cases, January 2017-September 2021
2004	LegalMetric District Report Texas Eastern District Court in
	Patent Cases, January 2017-September 2021
2005	Order Granting Joint Motion to Dismiss Claims of Patent
	Owner and Cisco Systems, Inc. with Prejudice (E.D. Tex.)
2006	Claim Construction Order filed February 24, 2022 (W.D.
	Tex.)
2007	Claim Construction Order March 23, 2022 (W.D. Tex.)
2008	Complaint for Patent Infringement filed May 25, 2021 (W.D.
	Tex.)
2009	Claim Construction Memorandum Opinion and Order March
	14, 2022 (E.D. Tex.)
2010	BillJCo's Motion to Compel (Redacted Copy) (E.D. Tex.)
2011	Defendants, Hewlett Packard Enterprise Company and
	Aruba Networks, LLC' Motion to Compel Discovery
	(Redacted Copy) (E.D. Tex.)
2012	Affidavit of Service of Apple Inc. on May 28, 2021 (W.D.
	Tex.)
2013	Affidavit of Service of Cisco Systems, Inc. on May 26, 2021
	(E.D. Tex.)
2014	Affidavit of Service of Hewlett Packard Enterprise Company
	on May 25, 2021 (E.D. Tex.)
2015	Affidavit of Service of Aruba Networks on May 25, 2021
	(E.D. Tex.)
2016	Apple Inc.'s Preliminary Invalidity Contentions (W.D. Tex.)
2017	Defendants' Preliminary Invalidity Contentions (E.D. Tex.)
2018	First Amended Docket Control Order (E.D. Tex.)



Exhibit	Description
2019	Complaint for Patent Infringement filed May 25, 2021
	(Cisco System, Inc.) (E.D. Tex.)
2020	Complaint for Patent Infringement filed May 25, 2021
	(Hewlett Packard Enterprise Company and Aruba Networks,
	LLC (E.D. Tex.)
2021	Apple Inc.'s Final Invalidity Contentions (W.D. Tex.) (pp
	1097-1421)
2022	Order regarding Apple Inc.'s Motion to Dismiss (W.D. Tex.)
2023	Order regarding Mediation between Hewlett Packard
	Enterprise Company, Aruba Networks and Patent Owner
	(E.D. Tex.)
2024	Affidavit of Courtland C. Merrill in Support of <i>Pro Hac Vice</i>
	Admission Under 37 C.F.R. § 42.10 (c)
2025	Declaration of Jacob Sharony re '804 Patent
2026	Deposition of Darryl Long dated September 29, 2022 in
	IPR2022-00426 Petition for Inter Partes Review of U.S.
	Patent 8,761,804
2027	Excerpts of U.S. Patent 10,292,011
2028	Amended Complaint and Select Exhibits [Northern District
	of California] (SEALED)
2029	Patent License Agreement (SEALED)
2030	Patent License Agreement (SEALED)
2031	Patent License Agreement (SEALED)
2032	Video: "What's New in Core Location - WWDC 2013 -
	Videos - Apple Dev.mp4" [Produced Natively]
2033	Transcript Excerpt from Video "What's New in Core
	Location – WWDC 2013 -Videos – Apple Dev.mp4" from:
	https://developer.apple.com/videos/play/wwdc2013/307/ at
	[32:40 – 33:59] (accessed Apr. 22, 2021)
2034	Screen shot from video: "What's New in Core Location -
	WWDC 2013 - Videos - Apple Dev.mp4" at 34:18
2035	Getting Started with iBeacon
	[https://developer.apple.com/ibeacon/Getting-Started-with-
	iBeacon.pdf]
2036	Deposition of Darryl Long dated September 29, 2022 in
	IPR2022-00426 Petition for Inter Partes Review of U.S.
	Patent 8,761,804



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