## UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., and APPLE INC., Petitioner, v. SMART MOBILE TECHNOLOGIES LLC, Patent Owner. Case IPR2022-01249 Patent 9,019,946 B1

#### PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



Proceeding No.: IPR2022-01249 Attorney Docket: 39843-0126IP1

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Proceeding No.: IPR2022-01249 Attorney Docket: 39843-0126IP1 The Intrinsic Record Supports Petitioner's Understanding of Yegoshin, Alone or As Modified, Renders The "Multiplex" Limitations Yegoshin Teaches Both Simultaneous and Selective Cellular and The Yegoshin-Bernard Combination Renders Obvious "Multiplexed Signals"......22 Patent Owner's Arguments Do Not Impact Petitioner's Prior Art Sufficient Motivations Existed To Modify Yegoshin-Johnston-

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### **EXHIBIT LIST**

EX-1001	U.S. Patent No. 9,019,946 to Raman K Rao, et al. ("the '946 patent")
EX-1002	Excerpts from the Prosecution History of the '946 Patent ("the Prosecution History")
EX-1003	Declaration of Dr. Michael Allen Jensen
EX-1004	U.S. Patent No. 6,711,146 to Leonid A. Yegoshin ("Yegoshin")
EX-1005	U.S. Patent No. 5,784,032 to Ronald H. Johnston, et al. ("Johnston")
EX-1006	U.S. Patent No. 5,590,133 to Lars Billström, et al. ("Billström")
EX-1007	U.S. Patent No. 5,497,339 to Marc A. Bernard ("Bernard")
EX-1008	International Patent Publication No. WO 98/27748 ("WO748")
EX-1009	U.S. Patent No. 5,854,985 to Joseph B. Sainton, et al. ("Sainton")
EX-1010	U.S. Patent No. 6,031,503 to Joseph A. Preiss, II, et al. ("Preiss")
EX-1011	Larry L. Peterson and Bruce S. Davie, Computer Networks: A Systems Approach, Morgan Kaufmann Publishers, Inc., San Francisco, CA, 1996
EX-1012	Andrew S. Tanenbaum, Computer Networks, Third Edition, Prentice Hall PTR, Upper Saddle River, NJ, 1996
EX-1013	Merilee Ford, H. Kim Lew, Steve Spanier, and Tim Stevenson, Internetworking Technologies Handbook, New Riders Publishing, Indianapolis, IN, 1997
EX-1014	William Stallings, Data and Computer Communications, 5th Edition, Prentice Hall, Upper Saddle River, NJ, 1996



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EX-1015	Dictionary Definition of "time division multiplex" (Newton's Telecom Dictionary, 1998)
EX-1016	U.S. Patent No. 6,115,615 to Takeshi Ota, et al.
EX-1017	U.S. Patent No. 6,366,622 Stephen Joseph Brown
EX-1018	U.S. Patent No. 6,560,443 to Ari Vaisanen, et al.
EX-1019	U.S. Patent No. 5,680,633 to Steven E. Koenck, et al.
EX-1020	U.S. Patent No. 6,047,322 to Aseem Vaid, et al.
EX-1021	Excerpts from Theodore S. Rappaport, Wireless Communications Principles & Practice, Prentice Hall, 1996
EX-1022	R. G. Vaughan, et al., Antenna diversity in mobile communications, in IEEE Transactions on Vehicular Technology, vol. 36, no. 4, pp. 149-172, Nov. 1987
EX-1023	S. M. Alamouti, A simple transmit diversity technique for wireless communications, in IEEE Journal on Selected Areas in Communications, vol. 16, no. 8, pp. 1451-1458, Oct. 1998
EX-1024	Excerpts from Douglas E. Comer, Internetworking with TCP/IP Volume One, Third Edition, 1995
EX-1025	U.S. Patent No. 5,768,691 to Jorma Matero, et al.
EX-1026	U.S. Patent No. 5,960,344 to Ronald L. Mahany
EX-1027	European Patent Application 0 660 626 A2 to John Daniel Byrne
EX-1028	Excerpts from William C. Jakes, Microwave Mobile Communications, IEEE Press, 1974
EX-1029	[RESERVED]
EX-1030	Yi-Bing Lin, Cellular digital packet data, in IEEE Potentials, vol. 16, no. 3, pp. 11-13, AugSept. 1997



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