

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORP., DELL TECHNOLOGIES INC., and DELL INC.,
Petitioners,

v.

OZMO LICENSING LLC,
Patent Owner.

Case No. IPR2023-01060
U.S. Patent No. 8,599,814

PATENT OWNER PRELIMINARY RESPONSE

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1. The alleged combination fails to disclose or render obvious the Claim 1 limitation of: “wherein the second wireless network protocol is an overlay protocol with respect to the first wireless network protocol”32

2. The alleged combination fails to disclose or render obvious the Claim 1 limitation of: “initiating and maintaining wireless network connections with nodes of a wireless network external to the network-enabled hub, maintaining at least a first wireless network connection using a first wireless network protocol and a second wireless network connection using a second wireless network protocol, that can be maintained, at times, simultaneously with each other”35

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- 1. The alleged combination fails to disclose or render obvious the Claim 1 limitation of: “wherein the second wireless network protocol is an overlay protocol with respect to the first wireless network protocol”40
- 2. The alleged combination fails to disclose or render obvious the Claim 1 limitation of: “initiating and maintaining wireless network connections with nodes of a wireless network external to the network-enabled hub, maintaining at least a first wireless network connection using a first wireless network protocol and a second wireless network connection using a second wireless network protocol, that can be maintained, at times, simultaneously with each other”42

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