IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG ELECTRONICS CO., LTD.,

Petitioners.

v.

COBBLESTONE WIRELESS, LLC,

Patent Owner.

Case No. IPR2024-00319

U.S. Patent No. 8,891,347

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,891,347



TABLE OF CONTENTS

I.	Introduction.			1		
II.	Stand	Standing				
III.	Ident	Identification of Challenge And Relief Requested				
IV.	Publi	c Avai	lability of Sesia	3		
V.	Leve	l Of Oı	dinary Skill In The Art	6		
VI.	The '	347 pa	tent	6		
	A.	Over	view	6		
VII.	Claim Construction					
	A.	"path	parameter information"	11		
	B.		istorting a second signal at the transmitter in a time in, frequency domain, and a spatial domain"	12		
VIII.	The Prior Art					
	A.	Sesia (Ex. 1003)				
	B.	Motivation to Combine				
	C.	Forer	nza (Ex. 1014)	25		
IX.	Grounds of Rejection					
	A.	Ground 1: Sesia				
		1.	Claim 1	29		
		2.	Claim 2	45		
		3.	Claim 3	48		
		4.	Claim 4	49		
		5.	Claim 6	50		



Petition for Inter Partes Review U.S. Patent No. 8,891,347

		6.	Claim 7	52
		7.	Claims 8-12, 14-17, 19-23	54
	В.	Ground 2: Forenza57		57
		1.	Claim 1	57
		2.	Claim 2	67
		3.	Claim 3	67
		4.	Claim 4	67
		5.	Claim 6	68
		6.	Claim 7	68
		7.	Claims 8-12, 14-17, 19-23	68
X.	Discr	Discretionary Denial		
	A.	Fintiv		
	B.	General Plastic72		
	C.	35 U.S.C. §325(d)73		
XI.	Mandatory Notices And Fees			73
	A.	Real Party-In-Interest		
	B.	Related Matters74		
	C.	Counsel and Service Information		
	D.	Payment of Fees75		
XII.	Conc	lusion	l	75



EXHIBIT LIST

Ex.	Description
1001	U.S. Patent No. 8,891,347 to Yin
1002	Prosecution History of U.S. Patent No. 8,891,347
1003	Stefania Sesia, et al., "LTE: The UMTS Long Term Evolution from Theory to Practice," ("Sesia")
1004	Expert Declaration of Dr. Hall-Ellis as filed in IPR2024-00136
1005	Expert Declaration of Dr. Kevin Almeroth
1006	Patent Owner's Infringement Contentions against AT&T in <i>Cobblestone Wireless, LLC v. AT&T Inc. et al</i> , No. 2:22-cv-00474 (E.D. Tex.) filed December 15, 2022
1007	3GPP TSG RAN WG1 Meeting #60, R1-101217, February 22-23, 2010, San Francisco, USA, available at
1008	3GPP TSG RAN WG1 Meeting #60, R1-100926, February 22-26, 2010, San Francisco, USA, available at https://www.3gpp.org/ftp/tsg_ran/WG1_RL1/TSGR1_60/Docs
1009	Patent Owner's Infringement Contentions against T-Mobile in <i>Cobblestone Wireless, LLC v. T-Mobile USA, et al.</i> No. 2:22-cv-00477 (E.D. Tex.) filed December 16, 2022
1010	Patent Owner's Infringement Contentions against Verizon in Cobblestone Wireless, LLC v. Verizon Communications Inc., et al., No. 2:22-cv-00478 (E.D. Tex.) filed December 16, 2022
1011	Docket Control Order in <i>Cobblestone Wireless, LLC v. T-Mobile USA, et al.</i> No. 2:22-cv-00477 (E.D. Tex.) (Dkt. No. 62)
1012	Katherine K. Vidal, Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation (June 21, 2022)

1013	Wiley Online Library listing for Sesia as of November. 22, 2023 (https://onlinelibrary.wiley.com/doi/book/10.1002/9780470978504?S eriesKey=10.1002/9780470742891)
1014	U.S. Patent No. 8,654,815 to Forenza
1015	Patent Owner's Infringement Contentions against Samsung in <i>Cobblestone Wireless, LLC v. Samsung Electronics America, Inc., et al.</i> , No. 2:23-cv-00285 (E.D. Tex.) filed June 16, 2023
1016	Amitabha Ghosh, 5G New Radio (NR): Physical Layer Overview and Performance, IEEE Communication Theory Workshop (May 15, 2018)
1017	Cobblestone Wireless, LLC v. Samsung Electronics Co., Ltd., No. 2:22-cv-00285-JRG-RSP, Dkt. 29-1, Docket Control Order
1018	Curriculum Vitae of Dr. Kevin Almeroth

DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

