

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC. and LG ELECTRONICS, INC.,

Petitioner,

v.

CORE WIRELESS LICENSING S.A.R.L.,

Patent Owner.

Case IPR2015-01715

Patent 7,072,667 B2

PATENT OWNER'S PRELIMINARY RESPONSE TO
PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,072,667
UNDER 35 USC §§ 311-319 AND 37 CFR §42.100 ET SEQ.

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I. INTRODUCTION.

Petitioner seeks *inter partes* review of claims 1-15 of U.S. Patent 7,072,667 (the “’667 Patent”). The Patent Trial and Appeal Board (“PTAB” or “Board”) should not institute *inter partes* review of the ‘667 Patent because Petitioner has not met its burden to show a reasonable likelihood that it would prevail with respect to at least one of the challenged claims.¹ In particular, Petitioner has failed to demonstrate that claims 1-3 and 8-14 are anticipated by International Patent Publication WO 00/36430 of Staack et al. (“Staack”) (Ex. 1003); claims 5-7 and 15 are obvious under 35 U.S.C. § 103(a) over Staack in view of U.S. Patent No. 6,275,707 to Reed et al. (“Reed”) (Ex. 1004); and claim 4 is over obvious under 35 U.S.C. § 103(a) over Staack in view of U.S. Patent No. 6,442,391 to Johansson et al. (“Johansson”) (Ex. 1005).

All of Petitioner’s proposed grounds for institution of trial rely on Staack, which is alleged to teach the claimed systems and performing the

¹ 35 U.S.C. § 314(a) (An *inter partes* review may be instituted only if “the information presented in the petition . . . and any response . . . shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.”); 37 C.F.R. § 42.108(c).

claimed methods “without pre-registering the mobile station for [with] the location finding service.” *See, e.g.*, Pet. at 24-26. However, as demonstrated below, Staack fails to provide such teachings. Accordingly, Petitioner has not met (and cannot meet) its burden, and so no *inter partes* review should be instituted on the proposed grounds.

Petitioner also has filed two separate petitions challenging the patentability of the claims of the ‘667 Patent, Pet. at 4; *and see* IPR2015-01714, yet Petitioner offers no convincing rationale as to why trials under both petitions should be instituted. The Board should deny at least one of these challenges as redundant.

II. OVERVIEW OF THE ‘667 PATENT.

The ‘667 Patent discloses a location information service for mobile stations in a cellular telecommunications network. In accordance with embodiments of the invention, a request for location information is sent as a message through the network to a location message server. The location message server has an associated data store that contains location information based on cells of the network within which mobile stations may be located. Location information based on the cell occupied by at least one

mobile station is derived from the data store and sent through the network from the location message server as a message to the mobile station that requested the information. According to the invention, the service is provided *without requiring pre-registration of the subscriber that uses the mobile station* for/with the location finding service. See, e.g., Ex. 1001 at 1:52 – 2:2; 3:36 – 4:14; 5:24-27.

An example of the process is illustrated in Figure 3, which refers to network elements shown in Figure 1. These illustrations are reproduced below.

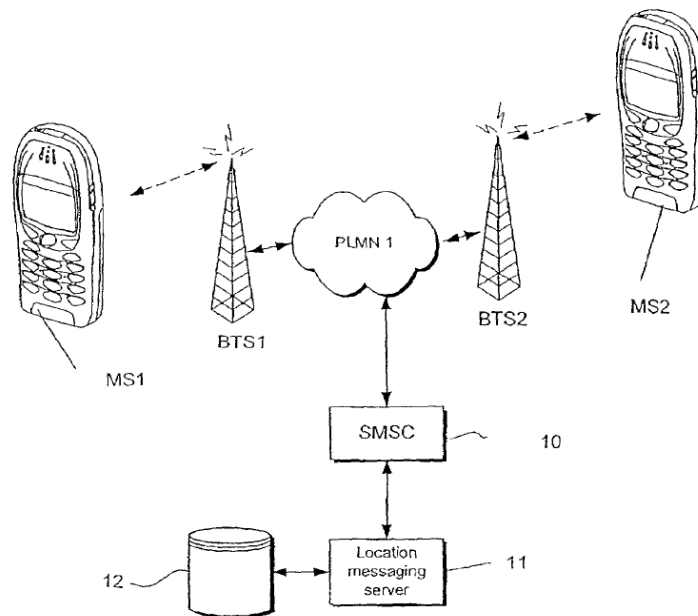


Fig. 1

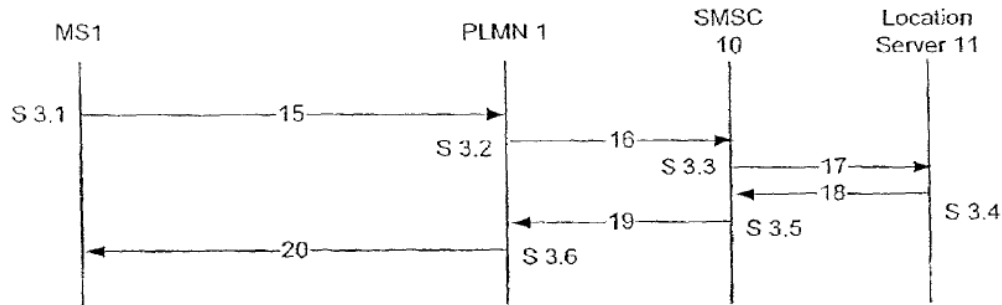


Fig. 3

At step S3.1, a mobile station MS1 sends a request 15 in the form of a message via base station controller BTS1 to the network PLMN 1. The message is passed to a SMS message center (SMSC) 10 at step S3.2, as request 16. The request identifies the requesting mobile station (MS1) and the data being sought. *Id.* at 3:36-48. For example, the request from the mobile station MS1 may be for information concerning its own location, or the location of another mobile station. *Id.* at 2:3-13.

The SMSC 10 refers the request to a location message server 11, which refers to the database 12 in order to fetch stored data corresponding to the cell in which a mobile station for which location information is sought is located. At step S3.4, the location message server provides the requested data 18 to the SMSC 10 in response to the location request. The SMSC 10 then creates a message 19 containing the retrieved data from the location messaging server 11 and the resulting message is sent at step S3.5 to

PLMN1 and thence as message 20 to mobile station MS1 at step S3.6. The message can be then displayed by MS1 and, if appropriate, stored therein for future use. *Id.* at 3:49 – 4:14.

An important feature of this process is that it is performed without the need to form pre-registered groups of users. *Id.* at 1:66-67. That is, “***each individual mobile station*** can make use of the location information service ***without having to pre-register***” for/with the location finding service. *Id.* at 1:67 – 2:2 (emphasis added). As noted in the Background of the ‘667 Patent, prior location finding services required a user to subscribe with a location finding service, for example to define (with the location finding service) lists of individuals that the user wanted to be able to locate. *Id.* at 1:34-36. “This involves a pre-registration procedure with the vendor of the [location] service.” *Id.* at 1:36-39. In accordance with the invention of the ‘667 Patent, however, this requirement is eliminated. *Id.* at 1:66 – 2:2; 5:24-27.

III. ARGUMENT

A. Petitioner's Proposed Grounds for Institution of Trial with Respect to Claim 1 Are Insufficient as a Matter of Law.

Petitioner has not met its burden to show a reasonable likelihood that it would prevail with respect to its challenge to the patentability of claim 1. More specifically, Petitioner has failed to demonstrate that claim 1 is anticipated under 35 U.S.C. § 102(b) by Staack. Consequently, no *inter partes* review should be instituted on this proposed ground.

In alleging the anticipation of claim 1, Petitioner relies on the absence of disclosure in Staack. Pet. at 24. More particularly, Petitioner contends “Staack ***nowhere discloses*** that pre-registration is required to access the location-based services.” *Id.* (emphasis added). According to Petitioner, this satisfies the claim 1’s requirement that the method of providing a location finding service to mobile stations in a cellular telecommunications network, “without pre-registering the mobile station for the location finding service,” because “[n]egative limitations may be satisfied by silence in the prior art.” *Id.*, quoting *CLIO USA, Inc. v. The Procter and Gamble Company*, IPR2013-00448, Paper No. 15, slip op. at 3 (PTAB Feb. 4, 2014).

However, Petitioner’s arguments in this regard fail. First, Staack **does explicitly disclose** that pre-registration is required for the location-based services. See, e.g., Ex. 1003 at 10:6-10 (explaining that the locating entity

MLU uses a mobile subscriber's home location data from a billing center or subscriber database for the location service); 14:27-29 ("The WTA server [i.e., a network entity that provides the location service, *id.* at 14:13-16] could store a list correlating user names and phone numbers or other identities (e.g. MSISDN). Alternatively the WTA server could be capable of consulting such a list stored elsewhere, for example at a global name server or HLR."). Second claim 1's requirement of performing the recited method "without pre-registering the mobile station for the location finding service" is ***not*** a negative limitation. Instead, the requirement specifies (in a positive fashion) how the method is to be performed, not the reverse. Accordingly, the determinations in *CLIO USA*, *Palo Alto Networks*, and the cases cited therein are inapposite inasmuch as no negative limitation is present.

1. Claim 1 Specifies a Positive Requirement of Performing the Recited Method.

Petitioner's case for anticipation hinges on the requirement that the condition of performing the method recited in claim 1 "without pre-registering the mobile station for the location finding service" be read as a so-called *negative limitation*. This term derives from instances such as that encountered in *In re Schechter*, where a limitation that read "R is an alkenyl radical ***other than*** 2-butenyl and 2,4-pentadienyl" was deemed indefinite

because it was an attempt to claim the invention by excluding what the inventors did not invent rather than distinctly and particularly pointing out what they did invent. 205 F.2d 185, 187 (CCPA 1953) (emphasis added). However, this is not the case with claim 1 of the '667 Patent.

Claim 1 recites,

A method of providing a location finding service to mobile stations in a cellular telecommunications network, comprising:

 sending a request for location finding information from a mobile station as a message through the network to a location message server;

 retrieving data from a data store corresponding to the location finding information based on the cell occupied by at least one mobile station; and

 sending the data through the network from the location message server as a message to the mobile station that requested the location finding information; and wherein

 the method is performed without pre-registering the mobile station for the location finding service.

Ex. 1001 at 6:38-51.

The preamble of claim 1, “A method of providing a location finding service to mobile stations in a cellular telecommunications network” is properly deemed a limitation of the claim, for example because it brings

“life and meaning” to the claim by providing antecedent basis for terms such as “method,” “network,” and “location finding service” used in the body of the claim. *See Bell Communications Research v. Vitalink Communications Corporation*, 55 F. 3d 615, 621 (Fed. Cir. 1995); *Corning Glass Works v. Sumitomo Elec. U.S.A., Inc.*, 868 F.2d 1251, 1257 (Fed. Cir. 1989).

Furthermore, by its very terms, the claim requires that this entire method be “performed without pre-registering the mobile station for the location finding service.” Rather than reciting something that the invention is not, this limitation, which specifies the manner in which the entire recited method must be practiced, specifies a part of what the invention *is*. In other words, claim 1 recites not just a method of providing a location finding service to mobile stations in a cellular telecommunications network. But rather, such a method practiced with the condition that it is performed without pre-registering the mobile station for the location finding service.

In *inter partes* review, the claims of an unexpired patent are given their broadest reasonable interpretation. *In re Cuozzo Speed Techs., LLC.*, 778 F.3d 1271, 1281 (Fed. Cir. 2015). However, an interpretation that is inconsistent with the express disclosure and objectives of the patent is not “reasonable.” *See, e.g., In re Cortright*, 165 F.3d 1353, 1359 (Fed. Cir. 1999). Thus, the focus of the inquiry regarding the meaning of a claim

should be what would be reasonable from the perspective of one of ordinary skill in the art. *In re Suitco Surface, Inc.*, 603 F.3d 1255, 1260 (Fed. Cir. 2010). This involves reading the claim in light of the specification and teachings in the underlying patent. *Id.* citing *Schriber-Schroth Co. v. Cleveland Trust Co.*, 311 U.S. 211, 217 (1940).

In the present case, the inventors specified that an important feature of providing a location finding service to mobile stations in a cellular telecommunications network is performing such services without the need to pre-register the mobile station for the service. A particular failing of the prior art was the need for such pre-registration, for example to specify groups of users for which location finding services could be utilized. Ex. 1001 at 1: 46-48, 66-67. According to the invention, however, “***each individual mobile station*** can make use of the location information service ***without having to pre-register***” for the location finding service. *Id.* at 1:67 – 2:2 (emphasis added).

Providing location finding services to a mobile station within a cellular telecommunications network is distinctly different than providing such services without pre-registering the mobile station for the location finding service. By specifying that the recited method is performed under such strictures, the claim is ***not*** an attempt to recite the invention by

excluding what the inventors did not invent rather the claim distinctly and particularly points out what they did invent. Accordingly, the requirement of performing the method “without pre-registering the mobile station for the location finding service,” is ***not*** a *negative* limitation; it is instead a *positive* limitation of the claim that specifies what the inventors invented.

2. *Staack Fails to Teach or Suggest Performing a Method of Providing Location Finding Service to Mobile Stations in a Cellular Telecommunications Network Without Pre-registering the Mobile Station for the Location Finding Service.*

Petitioner contends, “Staack ***nowhere discloses*** that pre-registration is required to access the location-based services.” Pet. at 24 (emphasis added). In fact, however, Staack **does explicitly disclose** that pre-registration is required for the location-based services. See, e.g., Ex. 1003 at 10:6-10 (explaining that the locating entity MLU uses a mobile subscriber’s home location data from a billing center or subscriber database for the location service); 14:27-29 (“The WTA server [i.e., a network entity that provide the location service, *id.* at 14:13-16] could store a list correlating user names and phone numbers or other identities (e.g. MSISDN). Alternatively the WTA server could be capable of consulting such a list stored elsewhere, for example at a global name server or HLR.”). Thus, mobile stations ***do*** need to be pre-registered for the location service in the list maintained or accessible

by the WTA server in order to use the location service provided by the WTA server.

Further, even if Petitioner is correct that Staack *nowhere discloses* that pre-registration is required to access the location-based services; it would also be true the case that Staack *nowhere discloses* that pre-registration is *not* required to access the location-based services. In short, Staack would be silent on this subject. Therefore, by definition, Staack cannot anticipate claim 1. *Schering Corp. v. Geneva Pharm.*, 339 F.3d 1373, 1377 (Fed. Cir. 2003) (a patent claim is “invalid for anticipation [only] if a single prior art reference discloses each and every limitation” of the claim); *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 (Fed. Cir. 1989) (“The identical invention must be shown in as complete detail as is contained in the ... claim.”).

Indeed, because the requirement of performing the method “without pre-registering the mobile station for the location finding service,” is *not* a *negative* limitation, Staack’s silence on this point cannot be used as evidence that Staack teaches, or even suggests, such a requirement. In *CLIO USA*, the limitation at issue read, “without permanent deformation.” IPR2013-00448, Paper No. 15, slip. op. at 3. As such, it “define[d] the claimed subject matter by what it [was] not, rather than by what it [was].” *Id.*, citing *Upsher-Smith*

Labs, Inc. v. PamLab, LLC, 412 F.3d 1319, 1322 (Fed. Cir. 2005).

Accordingly, in that circumstance, the negative limitation was satisfied by silence in the prior art. *Id.* at 3-4, citing, *inter alia*, *Süd-Chemie, Inc. v. Multisorb Technologies, Inc.*, 554 F.3d 1001, 1004-05 (Fed. Cir. 2009).

Likewise, in *Palo Alto Networks*, the claim at issue concerned a negative limitation (the absence of a particular signal) and so the limitation recited what the claim lacked, not what it required and it was appropriate to find the claimed subject matter in a reference that did not otherwise require the presence of the subject signal. IPR2013-00466, Paper No. 18, slip. op. at 18.

In the present case, however, claim 1's requirement of performing the recited method "without pre-registering the mobile station for the location finding service" is not a negative limitation. Instead, the requirement specifies how the method is to be performed, not the reverse. That is, the claim requires that the method be performed under the specified (positive) condition of not pre-registering the mobile station for the location finding service. Accordingly, the determinations in *CLIO USA*, *Palo Alto Networks*, and the cases cited therein are inapposite inasmuch as no negative limitation is present. Consequently, Staack's failure to disclose performing its disclosed method "without pre-registering the mobile station for the location

finding service,” cannot properly be said to anticipate claim 1 which specifies such a requirement.

Finally, Petitioner’s comments regarding the maintenance and use of a list of entities that are permitted to be given location information on a mobile station, Pet. at 25, are not germane to the question of whether or not Staack teaches performing its disclosed method “without pre-registering the mobile station for the location finding service.” In considering the desirability for “a list of entities that are permitted to be given location information on a mobile station MS2,” Ex. 1003 at 14:16-17, Staack is commenting on a separate problem from pre-registering mobile stations for a location finding service. Instead, Staack is describing considerations where, even if a mobile station is so pre-registered, other users may not wish to have their locations divulged. *Id.* at 14:16-23. That is, the user of mobile station MS2 may not wish to have the user of mobile station MS1 know the MS2 user’s location, and so the MS2 user may provide a list such that requests from the MS1 user are rejected. *Id.*

These considerations of confidentiality exist whether or not the MS1 user is pre-registered for the mobile location service or not. Indeed, Staack makes no mention of different treatment if the MS1 user is pre-registered or not and instead remains silent on the subject. Therefore, contrary to

Petitioner's contentions, Staack's disclosures concerning confidentiality concerns would not have influenced a person of ordinary skill in the art concerning whether or not the process of Staack could be performed without pre-registering mobile stations for a location finding service.

For at least the foregoing reasons, Petitioner has failed to demonstrate that claim 1 is anticipated under 35 U.S.C. § 102(b) by Staack; hence, no *inter partes* review should be instituted on this proposed ground.

B. Petitioner's Proposed Grounds for Institution of Trial with Respect to Claims 2, 3, and 8-14 Should be Denied for the Same Reasons as the Challenge to Claim 1.

Claims 2, 3, 8, and 9 depend from claim 1 and, therefore, include all of the same limitations as claim 1. Hence, each respective dependent claim is patentable over Staack for at least the same reasons as claim 1.

Claim 10 is similar to claim 1 in that it recites, "the network being configured to send the data as a message to the mobile station that requested the location finding information, *without pre-registering the mobile station for the location finding service.*" Ex. 1001 at 7:25-29 (emphasis added).

Claim 11 specifies that the message is an SMS message. *Id.* at 7:32-34.

Petitioner again relies on Staack for teaching the "without pre-registering" limitation of claim 10 by virtue of its silence on the subject, Pet.

at 38, however, for the same reasons discussed above with respect to claim 1, these arguments fail. Accordingly, claim 10 and its dependent claim 11 are patentable over Staack for at least the same reasons as claim 1, and Petitioner's challenge with respect to claims 10 and 11 should be denied for the same reasons as with respect to claim 1.

Claim 12 recites, "A method of operating a mobile station to receive location information from a location finding service in a cellular telecommunications network . . . wherein the method is performed without pre-registering the mobile station for the location finding service." Ex. 1001 at 8:1-12. Petitioner relies on the same arguments for finding this teaching in Staack, Pet. at 42, however, for the same reasons discussed above with respect to claim 1, these arguments fail. Accordingly, Petitioner cannot satisfy its burden to show a reasonable likelihood that it would prevail with respect to this challenge and no *inter partes* review should be instituted on this ground.

Claim 13 recites, "A mobile station for receiving location finding information from a location finding service in a cellular telecommunications network . . . , wherein provision of the location finding information being made without pre-registering the mobile station with the location finding service." Ex. 1001 at 8:14-26. Petitioner relies on the same arguments for

finding this teaching in Staack, Pet. at 45, however, for the same reasons discussed above with respect to claim 1, these arguments fail. Accordingly, Petitioner cannot satisfy its burden to show a reasonable likelihood that it would prevail with respect to this challenge and no *inter partes* review should be instituted on this ground.

Claim 14 depends from claim 13 and so Petitioner's challenge with respect to claim 14 should be denied for the same reasons as with respect to claim 13.

C. Petitioner's Proposed Grounds for Institution of Trial with Respect to Claims 5-7 and 15 in View of Staack and Reed Should be Denied.

In challenging the patentability of claims 5-7 (which depend from claim 1) and 15 (which depends from claim 13), Petitioner relies on the combined teachings of Staack and Reed. Pet. at 46 et seq. With respect to claim 5, Reed is cited for teachings concerning sending location finding information from the other mobile station to the mobile station that made the request. *Id.* at 46-47. With respect to claims 6 and 15, Reed is cited in connection with "re-directing the message from the mobile station that requested the location finding information, to another mobile station." *See, e.g., id.* at 48-49. With respect to claim 7, Reed is cited for teaching

“modifying the message and then re-directing the modified message to another mobile station.” *Id.* at 50-52.

Whether these contentions are true or not, and irrespective of whether the person of ordinary skill in the art would have combined the teachings of Reed with those of Staack as alleged by Petitioner, the combination of Staack and Reed still would not suggest the elements of claims 1 or 13, as described above. In particular, this combination of reference would not suggest that the method of providing the location finding service is performed without pre-registering the mobile station for the location finding service. Accordingly, Petitioner cannot satisfy its burden to show a reasonable likelihood that it would prevail with respect to these challenges and no *inter partes* review should be instituted on these grounds.

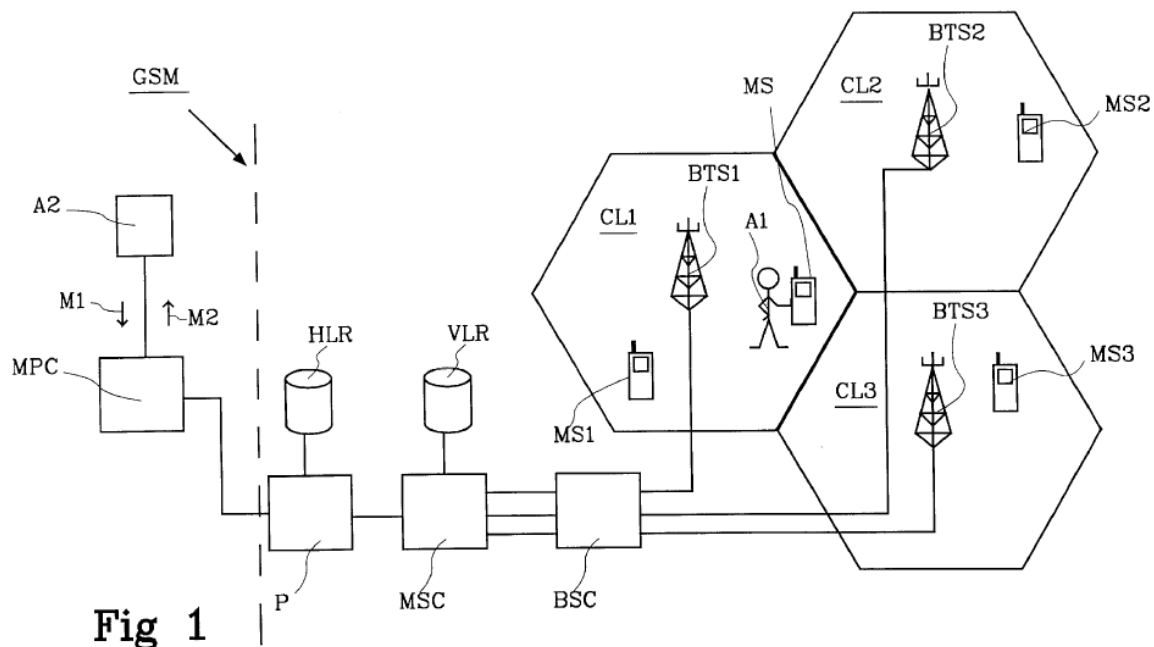
D. Petitioner’s Proposed Grounds for Institution of Trial with Respect to Claim 4 in View of Staack and Johansson Should be Denied.

In challenging the patentability of claim 4 (which depends from claim 1), Petitioner relies on the combined teachings of Staack and Johansson. Pet. at 55 et seq. In particular, Johansson is cited for teachings concerning a mobile station itself permitting its location to be sent to others. *Id.* at 57-58. Whether true or not, and irrespective of whether the person of ordinary skill

in the art would have combined the teachings of Johansson with those of Staack as alleged by Petitioner, the combination of Staack and Johansson still would not suggest the elements of claim 1 described above.

In particular, this combination of references would not suggest that the method of providing the location finding service is performed without pre-registering the mobile station for the location finding service, as recited in claim 1. As noted above, Staack fails to teach such a method, and neither does Johansson.

Johansson provides an illustration of the communications system in which its disclosed methods operate in Figure 1, reproduced below for convenience.



Notably, Johansson does not disclose that the party A2 is associated with a mobile station. Indeed, Figure 1 from Johansson shows party A2 outside the boundary of the cellular telecommunications network (GSM). Hence, Johansson cannot teach the provision of location finding services to mobile stations in a cellular telecommunications network.

Moreover, Johansson does not teach providing a location finding service to mobile stations in a cellular telecommunications network “***without pre-registering the mobile station for the location finding service.***” In Johansson, ***all*** mobile stations in the mobile communications system are pre-registered with the mobile locating service service inasmuch as “the arrangement includes an indicator I[, and mobile station users are] able to set the indicator I to indicate either one of two states, i.e. a permission granted state or a permission not-granted state.” Ex. 1005 at 5:1-4. The state of the indicator I (permission granted or permission not granted) determines whether, in response to a request for information concerning the location of the mobile station, the location information may be determined/released or not. *Id.* at 5:14-16, 56-65; 6:7-14. That is, in order to safeguard the privacy of mobile users, which is at the heart of Johansson’s developments, *see, e.g., id.* at 2:22-44; 4:13-15, all mobile stations set a special indicator, I – an indicator that is not normally included in cellular telecommunication

networks. *Id.* at 5:26-27 (indicating that inclusion of indicator I is a special modification).

Thus, if the teachings of Johansson were adapted for use with a mobile station, then that mobile station would *necessarily* be registered for the location finding service. Indeed, such registration is required in order to facilitate the crux of the Johansson process that allows users of mobile stations to permit or deny outsiders the ability to learn the user's geographic location through appropriate setting of the indicator I. *Id.* at 2:45-60; 4:13-15; 5:56 – 6:21. Accordingly, even by combining the teachings of Staack and Johansson Petitioner cannot satisfy its burden to show a reasonable likelihood that it would prevail with respect to this challenge and no *inter partes* review should be instituted on these grounds.

E. At Least One of Petitioner's Two Petitions Should be Denied as Redundant.

Petitioner has filed two separate petitions challenging the patentability of the claims of the '667 Patent, Pet. at 4; *and see* IPR2015-01714, yet Petitioner offers no convincing rationale as to why trials under both petitions should be instituted. Instead, Petitioner argues only that the references cited in the different petitions are cited under different statutory bases and/or allegedly teach limitations either explicitly or inherently. Pet. at 4-5. Neither

is a sufficient basis for instituting multiple proceedings, hence the Board should deny at least one of these challenges as redundant.

The Board has made clear that in order to ensure “the just, speedy, and inexpensive resolution of every proceeding,” it will not institute *inter partes* review proceedings on cumulative grounds. *Illumina, Inc. v. Trustees of Columbia Univ.*, IPR2012-00006, Paper 43 (PTAB May 10, 2013) citing 37 C.F.R § 42.1(b). Indeed, the Board has remarked that “[C]onsidering multiple rejections for the same unpatentability issue would unnecessarily consume the time and resources of all parties involved.” *Id.*

To avoid dismissal of a proposed ground of unpatentability, a petitioner must “provide a meaningful distinction between the different, redundant rejections.” *Id.* Where multiple references have been cited for the same facts, it is not enough for a petitioner to argue that the cited references are not identical, or to “speculate[] that in certain publications an element may be more clearly set forth in one publication rather than another.” *Id.* Rather, a petitioner must provide an adequate explanation as to the differences between the references and “how this difference would impact the unpatentability challenge.” *Id.*

Here, Petitioner has set forth no such adequate explanation or rationale. For example, Petitioner does not contend that different

constructions of the claims might be appropriate and assert the different references of the different petitions against such varying constructions. Instead, Petitioner merely suggests that the “strengths and weaknesses” of different prior art references are different. Pet. at 5. This is precisely the kind of conclusory analysis that the Board has repeatedly found insufficient to justify institution of trials on cumulative grounds. All Petitioner has done is to propose parallel sets of rejections without any adequate explanation as to why trials under both petitions should be instituted. Accordingly, at least one of Petitioner’s petitions should be denied as redundant.

IV. CONCLUSION.

For at least the foregoing reasons, Patent Owner respectfully submits that at least one or more of the grounds presented in the Petition should be denied. Further, as this is Patent Owner’s Preliminary Response, it is not a comprehensive rebuttal to all arguments raised by the Petition. If a trial is instituted, Patent Owner reserves the right to contest the Petition on all grounds instituted by the Board. Moreover, nothing herein should be construed as a concession or admission by Patent Owner as to any fact or argument proffered in the Petition.

Respectfully submitted,

Dated: November 24, 2015

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing

PATENT OWNER'S PRELIMINARY RESPONSE

was served on November 24, 2015, by filing this document through the Patent Review Processing System as well as by delivering a copy via overnight courier directed to the attorneys of record for the Petitioner at the following address:

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