

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SECURUS TECHNOLOGIES, INC.
Petitioner

v.

GLOBAL TEL*LINK CORPORATION
Patent Owner

Case IPR2016-00267
Patent No. 7,256,816

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,256,816

TABLE OF CONTENTS

I.	Introduction.....	1
II.	Statement of Precise Relief Requested for Each Claim Challenged.....	1
	A. Claims for Which Review Is Requested	1
	B. Statutory Grounds of Challenge.....	1
III.	Overview of the '816 Patent.....	2
IV.	The Level of Ordinary Skill in the Art	6
V.	Claim Construction.....	6
	A. “multiplexing means ...”.....	7
	B. “transmitting means ...”.....	11
VI.	<i>Bulriss</i> in View of <i>Hesse</i> Renders Obvious Claims 1-15, 18-21, 25-44, 47-50, 54, and 55	12
	A. Overview of <i>Bulriss</i>	12
	B. Overview of <i>Hesse</i>	17
	C. Rationale to Combine <i>Bulriss</i> and <i>Hesse</i>	18
	D. <i>Bulriss</i> and <i>Hesse</i> Collectively Teach Each and Every Feature of Claims 1-15, 18-21, 25-44, 47-50, 54, and 55.....	21
VII.	<i>Bulriss</i> in View of <i>Hesse</i> and Further in View of <i>Rae</i> Renders Obvious Claims 16-17, 22-24, 45-46, and 51-53	51
	A. Overview of <i>Rae</i>	51
	B. Rationale to Combine <i>Bulriss</i> , <i>Hesse</i> , and <i>Rae</i>	52
	C. <i>Bulriss</i> , <i>Hesse</i> , and <i>Rae</i> Collectively Teach Each and Every Feature of Claims 16-17, 22-24, 45-46, and 51-53	55
VIII.	Petitioner Presents New Grounds of Rejection	58

IX.	Mandatory Notices Under 37 C.F.R. § 42.8.....	58
A.	Real Party-in-Interest	58
B.	Related Matters.....	59
C.	Lead and Backup Counsel.....	59
D.	Service Information.....	59
X.	Grounds for Standing.....	59
XI.	Fee Payment.....	60
XII.	Conclusion	60

LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent No. 7,256,816 to Profanchik et al. (<i>the '816 patent</i>)
Ex. 1002	Declaration of Ivan Zatkovich (<i>Zatkovich Dec.</i>)
Ex. 1003	Curriculum Vitae of Ivan Zatkovich
Ex. 1004	Excerpts from Prosecution History of U.S. Patent No. 7,256,816
Ex. 1005	U.S. Patent No. 7,061,521 to Bulriss et al. (<i>Bulriss</i>)
Ex. 1006	U.S. Patent No. 7,046,779 to Hesse (<i>Hesse</i>)
Ex. 1007	U.S. Patent No. 7,899,167 to Rae (<i>Rae</i>)
Ex. 1008	U.S. Patent Publication 2003/0174826 A1 to Hesse
Ex. 1009	Defendant Global Tel*Link Corporation's Answer to Original Complaint and Counterclaims

TABLE OF AUTHORITIES

	Page(s)
Federal Cases	
<i>Altiris, Inc. v. Symantec Corp.</i> , 318 F.3d 1363 (Fed. Cir. 2003)	7
<i>Bosch v. Snap-on, Inc.</i> , 769 F.3d 1094 (Fed. Cir. 2014)	7
<i>In re GPAC</i> , 57 F.3d 1573 (Fed. Cir. 1995)	6
<i>KSR Int’l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	54
<i>Noah Sys., Inc. v. Intuit, Inc.</i> , 675 F.3d 1302 (Fed. Cir. 2012)	9
<i>Pfizer, Inc. v. Ranbaxy Labs. Ltd.</i> , 457 F.3d 1284 (Fed. Cir. 2006)	10
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005) (en banc)	7
<i>Securus Technologies, Inc. v. Global Tel*Link Corp.</i> , Case No. 3:14-cv-04233-M (N.D. Tex.).....	59
Federal Statutes	
35 U.S.C. § 102(e)	1, 2
35 U.S.C § 103.....	2
35 U.S.C. § 112.....	7, 8, 9, 10, 11
35 U.S.C. § 311.....	1, 11
Regulations	
37 C.F.R. § 42.8.....	60

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.