UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics Co. Ltd., Samsung Electronics America, Inc., and Apple Inc.,
Petitioners,

v.

Rosetta-Wireless Corporation,
Patent Owner.

Case IPR2016-00622[1]
Patent 7,149,511 B1

**PATENT OWNER'S RESPONSE UNDER 37 C.F.R. § 42.120
TO PETITION FOR *INTER PARTES* REVIEW
OF UNITED STATES PATENT NO. 7,149,511 B1**

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[1] Case IPR2016-00616 has been consolidated with this proceeding.

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EXHIBIT LIST

Petitioners' Exhibits

Exhibit	Description
Ex. 1001	U.S. Patent No. 7,149,511 to Bachner et al. ("the '511 Patent")
Ex. 1002	U.S. Patent No. 7,149,511 File History
Ex. 1003	U.S. Patent No. 7,149,511 *Ex Parte* Reexamination
Ex. 1004	Declaration of Dr. Erez Zadok In Support of the Petition for *Inter Partes Review* of United States Patent No. 7,149,511
Ex. 1005	U.S. Patent No. 6,012,063 to Bodnar ("Bodnar")
Ex. 1006	Declaration of David Lobato and Exhibit A - HP Jornada 820/820e Handheld PC User's Guide ("Jornada")
Ex. 1007	Declaration of David Lobato and Exhibit B - HP CapShare 920 Portable E-Copier ("CapShare")
Ex. 1008	IEEE100 The Authoritative Dictionary of IEEE Standards Terms, 7th ed.
Ex. 1009	Declaration of Rogelio Jose
Ex. 1010	Declaration of Fred Peal
Ex. 1011	Declaration of Sharon Lee
Ex. 1012	Declaration of Christopher Butler and Exhibit A - "EarthmateTM GPS Receiver: The Smart Way to Navigate" & Exhibit D - "EarthmateTM Accessories" ("DeLorme")
Ex. 1013	Declaration of Christopher Butler and Exhibit B - "HP Jornada External Keyboard (Part HP F1275A) Impressions" to Todd Ogasawara ("Ogasawara")
Ex. 1014	Declaration of Christopher Butler and Exhibit C - "1.2.3 Representing Programs" ("Representing Programs")
Ex. 1015	Certificate of Authenticity by Amy Klenke and "Proxim Delivering Industry's Lowest Priced Commercial Frequency Hopping Wireless LAN PC Card," Business Wire (Mar. 29, 1999) ("Proxim")
Ex. 1016	U.S. Patent No. 6,446,137 to Vasudevan et al. ("Vasudevan")
Ex. 1017	U.S. Patent No. 5,805,804 to Laursen et al. ("Laursen")
Ex. 1018	U.S. Patent No. 6,052,735 to Ulrich et al. ("Ulrich")
Ex. 1019	U.S. Patent No. 5,790,551 to Chan ("Chan")
Ex. 1020	U.S. Patent Pub. 2001/0029178 to Criss et al. ("Criss")
Ex. 1021	U.S. Patent No. 6,311,058 to Wecker et al. ("Wecker")
Ex. 1022	U.S. Patent No. 5,625,673 to Grewe et al. ("Grewe")
Ex. 1023	U.S. Patent No. 6,434,403 to Ausems et al. ("Ausems")
Ex. 1024	U.S. Pub. No. 2004/0204041 to Fillebrown et al. ("Fillebrown")

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Ex. 1025	U.S. Pat U.S. Patent No. 6,236,938 to Atkinson et al. ("Atkinson")
Ex. 1026	MICROSOFT COMPUTER DICTIONARY 5th Ed (2002)
Ex. 1027	U.S. Patent No. 5,297,192 (“Gerszberg”)
Ex. 1028	Rosetta's Local Patent Rule 2.2 Initial Infringement Contentions, dated January 20, 2016
Ex. 1029	Declaration of Ingrid Hsieh-Yee
Ex. 1030	Windows CE Developer’s Handbook by Terrence A. Goggin (“Goggin”)
Ex. 1031	Essential Windows CE Application Programming to Robert Burdick (“Burdick”)
Ex. 1032	Programming Microsoft Windows CE to Douglas Boling (“Boling”)
Ex. 1033	U.S. Patent No. 5,978,805 to Carson (“Carson”)
Ex. 1034	U.S. Patent No. 5,845,293 to Veghte et al. (“Veghte”)
Ex. 1035	U.S. Patent No. 5,864,853 to Kimura et al. (“Kimura”)
Ex. 1036	U.S. Patent No. 5,797,089 to Nguyen (“Nguyen”)
Ex. 1037	U.S. Patent No. 6,512,919 to Ogasawara (“Pat. Ogasawara”)
Ex. 1038	U.S. Patent No. 6,108,727 to Boals et al. (“Boals”)
Ex. 1040	Exhibit A to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1041	Exhibit B to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1042	Exhibit C to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1043	Exhibit D to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1044	Exhibit E to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1045	Exhibit F to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1046	Exhibit G to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1047	Exhibit H to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1048	Exhibit I to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1049	Exhibit J to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1050	Exhibit K to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1051	Exhibit L to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1052	Exhibit M to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)

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Ex. 1053	Exhibit N to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1054	Exhibit O to the Declaration of Ingrid Hsieh-Yee (Originally Part of Exhibit 1029)
Ex. 1055	Certificate of Authenticity by Amy Klenke (Originally Part of Ex-hibit 1015)
Ex. 1056	Declaration of David Lobato (Originally Part of Exhibits 1006 and 1007)
Ex. 1057	Declaration of Chris Butler (Originally Part of Exhibits 1012, 1013, and 1014)
Ex. 1058	Declaration of Dr. Nathaniel Polish (Originally AP-1002)
Ex. 1059	Patent Owner Rosetta's Initial Infringement Contentions served in Co-Pending Litigation Dec. 14, 2015 (excerpts) (Originally AP-1007)
Ex. 1060	U.S. 6,222,726 to Cha (Originally AP-1011)
Ex. 1061	Graham, THE FACTS ON FILE, DICTIONARY OF TELECOMMUNICATIONS (1983) (excerpts) (Originally AP-1012)
Ex. 1062	Declaration of David M. DesRosier
Ex. 1063	Biography of David M. DesRosier

Patent Owner's Exhibits

Exhibit	Description
Ex. 2001	Declaration of William H. Mangione-Smith, Ph.D.
Ex. 2002	ATP Proposal Preparation Kit
Ex. 2003	Email from David Nairn to Ed Bachner
Ex. 2004	"Moving Toward a Future of Ubiquitous Computing," Technology@Intel Magazine
Ex. 2005	"TECHNOLOGY; Verizon Plans Fast Internet for Cellphones," New York Times, Jan. 9, 2004.
Ex. 2006	"Data Over Cellular: A Look at GPRS," Communication Systems Design, April 2000.
Ex. 2007	Telecom & Networking Glossary, 1999.
Ex. 2008	Member benefits (available at https://www.oclc.org/membership/benefits.en.html)
Ex. 2009	"Libraries Hope for Web 2.0 Shake-up with New Site," Washington Internet Daily, Dec. 15, 2006.
Ex. 2010	Email from Sharon Shaffer to Keith Campbell
Ex. 2011	ATP Project Brief: Wireless Replication of Enterprise Data for Instant Access by Mobile Workers
Ex. 2012	"Wireless biz aims to link road warriors to office," Crain's Chicago Business, Jan. 14, 2002.
Ex. 2013	Email chain between Sergio Fogel and Ed Bachner
Ex. 2014	Declaration of Daniel A. Zaheer supporting motion for *pro hac vice* admission

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Ex. 2015	Declaration of Michael Ng supporting motion for *pro hac vice* admission
Ex. 2016	Declaration of William H. Mangione-Smith, Ph.D. (originally filed as Ex. 2001 in IPR2016-616)
Ex. 2017	Declaration of Edward F. Bachner III
Ex. 2018	"Shrinking the Server," InformationWeek, Jan. 21, 2002
Ex. 2019	"NIST puts money where the risk is," Government Computer News, Nov. 3, 2003
Ex. 2020	"Welcome to WIPS," Wireless Business & Technology, May 2004
Ex. 2021	"New Technology Could Challenge Ubiquitous Blackberry," MBA NewsLink, May 20, 2005
Ex. 2022	Second Declaration of William H. Mangione-Smith, Ph.D.
Ex. 2023	*Microsoft Computer Dictionary* (5th ed. 2002)
Ex. 2024	*IBM Dictionary of Computing* (10th ed. 1993)
Ex. 2025	*Network Dictionary* (May 15, 2007)
Ex. 2026	*Dictionary of Computer and Internet Terms* (10th ed., 2009)
Ex. 2027	*Microsoft Press Dictionary* (3rd. ed. 2002)
Ex. 2028	CeRapiInit (Windows CE 5.0), Microsoft Corporation, 2006
Ex. 2029	"Remote API (RAPI)," eTutorial.org

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