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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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UNIFIED PATENTS INC.  
Petitioner

v.

UNILOC USA, INC. and UNILOC LUXEMBOURG S.A.  
Patent Owners

IPR2016-01271  
Patent 8,566,960

**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT 8,566,960  
CHALLENGING CLAIMS 1–25  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

**TABLE OF CONTENTS**

|       |   |    |
|-------|---|----|
| I.    | MANDATORY NOTICES .....   | 1  |
| A.    | Real Party-in-Interest.....   | 1  |
| B.    | Related Matters .....   | 1  |
| C.    | Counsel.....  | 2  |
| D.    | Service Information, Email, Hand Delivery, and Postal.....                          | 3  |
| II.   | CERTIFICATION OF GROUNDS FOR STANDING.....  | 3  |
| III.  | OVERVIEW OF CHALLENGE AND RELIEF REQUESTED.....                                     | 3  |
| A.    | Prior Art Patents and Printed Publications.....                                     | 3  |
| B.    | Grounds for Challenge .....   | 4  |
| IV.   | INTRODUCTION .....  | 4  |
| V.    | TECHNOLOGY BACKGROUND.....  | 6  |
| A.    | License Management and DRM in General.....  | 6  |
| B.    | Validation of License Requests.....   | 7  |
| C.    | Enforcement of License Consumption Rules .....                                      | 8  |
| D.    | Transmission, Validation, and Registration of Device Identity.....                  | 11 |
| VI.   | OVERVIEW OF THE '960 PATENT .....   | 13 |
| A.    | Summary of the Alleged Invention.....   | 13 |
| B.    | Level of Ordinary Skill in the Art .....  | 16 |
| C.    | Prosecution History.....  | 16 |
| VII.  | CLAIM CONSTRUCTION .....  | 17 |
| VIII. | SPECIFIC GROUNDS FOR PETITION .....   | 20 |
| A.    | Ground I: Claims 1, 3–5, 8, 18–22, and 25 are anticipated<br>by <i>Abhuri</i> ..... | 21 |
| 1.    | <i>Overview of Abhuri</i> .....   | 21 |
| 2.    | <i>Claims 1, 22, and 25 are anticipated by Abhuri</i> .....                         | 24 |
| 3.    | <i>Claim 3 is anticipated by Abhuri</i> .....                                       | 35 |
| 4.    | <i>Claim 4 is anticipated by Abhuri</i> .....                                       | 35 |
| 5.    | <i>Claim 5 is anticipated by Abhuri</i> .....                                       | 35 |

|     |  |    |
|-----|--|----|
| 6.  | <i>Claim 8 is anticipated by Abburi</i> .....  | 36 |
| 7.  | <i>Claim 18 is anticipated by Abburi</i> .....   | 37 |
| 8.  | <i>Claim 19 is anticipated by Abburi</i> .....   | 37 |
| 9.  | <i>Claim 21 is anticipated by Abburi</i> .....   | 38 |
| 10. | <i>Claim 20 is anticipated by Abburi</i> .....   | 38 |
| B.  | Ground II: Claims 1–19 and 22–25 are obvious over <i>Gilder</i><br>in view of <i>Hu</i> and <i>Goringe</i> ..... | 39 |
| 1.  | <i>Overview of Gilder</i> .....  | 39 |
| 2.  | <i>Overview of Hu</i> .....  | 42 |
| 3.  | <i>Overview of Goringe</i> .....   | 43 |
| 4.  | <i>Claims 1, 22, and 25 are obvious over Gilder in view of Hu</i> .....  | 45 |
| 5.  | <i>Claim 2 is obvious over Gilder in view of Hu</i> .....  | 53 |
| 6.  | <i>Claim 3 is obvious over Gilder in view of Hu</i> .....  | 54 |
| 7.  | <i>Claim 4 is obvious over Gilder in view of Hu</i> .....  | 55 |
| 8.  | <i>Claim 5 is obvious over Gilder in view of Hu</i> .....  | 56 |
| 9.  | <i>Claim 6 is obvious over Gilder in view of Hu</i> .....  | 56 |
| 10. | <i>Claim 7 is obvious over Gilder in view of Hu</i> .....  | 57 |
| 11. | <i>Claim 8 is obvious over Gilder in view of Hu</i> .....  | 58 |
| 12. | <i>Claim 18 is obvious over Gilder in view of Hu</i> .....   | 59 |
| 13. | <i>Claim 19 is obvious over Gilder in view of Hu</i> .....   | 61 |
| 14. | <i>Claims 9 and 23 are obvious over Gilder in view of<br/>Hu and Goringe</i> .....                               | 61 |
| 15. | <i>Claims 14 and 24 are obvious over Gilder in view of<br/>Hu and Goringe</i> .....                              | 64 |
| 16. | <i>Claims 10, 11, and 15 are obvious over Gilder in view of<br/>Hu and Goringe</i> .....                         | 66 |
| 17. | <i>Claims 12 and 16 are obvious over Gilder in view of<br/>Hu and Goringe</i> .....                              | 67 |
| 18. | <i>Claims 13 and 17 are obvious over Gilder in view of<br/>Hu and Goringe</i> .....                              | 68 |
| IX. | CONCLUSION .....   | 68 |

**I. MANDATORY NOTICES**

**A. Real Party-in-Interest**

Pursuant to 37 C.F.R. § 42.8(b)(1), Unified Patents Inc. (“Unified” or “Petitioner”) certifies that Unified is the real party-in-interest, and further certifies that no other party exercised control or could exercise control over Unified’s participation in this proceeding, the filing of this petition, or the conduct of any ensuing trial. In this regard, Unified has submitted voluntary discovery. *See* EX1046 (Petitioner’s Voluntary Interrogatory Responses).

**B. Related Matters**

U.S. Patent 8,566,960 (“the ’960 Patent” (EX1001)) is owned by Uniloc Luxembourg S.A. and exclusively licensed to Uniloc USA, Inc. (collectively, “Uniloc” or “Patent Owners”). *See* EX1047 (Complaint), at 7.

On May 30, 2016, Uniloc filed multiple lawsuits in the Eastern District of Texas:

*Uniloc USA, Inc., et al v. Amazon.com, Inc. et al*, No. 2:16-cv-00570 (E.D. Tex. filed May 30, 2016);

*Uniloc USA, Inc., et al v. Google Inc.*, No. 2:16-cv-00571 (E.D. Tex. Filed May 30, 2016);

*Uniloc USA, Inc., et al v. Home Box Office, Inc.*, No. 2:16-cv-00572 (E.D. Tex. May 30, 2016);

*Uniloc USA, Inc., et al v. Hulu, LLC*, No. 2:16-cv-00573 (E.D. Tex. Filed May 30, 2016);

*Uniloc USA, Inc., et al v. Netflix, Inc.*, No. 2:16-cv-00574 (E.D. Tex. Filed May 30, 2016); and

*Uniloc USA, Inc., et al v. Valve Corp.*, No. 2:16-cv-00575 (E.D. Tex. Filed May 30, 2016).

Uniloc filed against, *inter alia*, Amazon.com, Inc., Google Inc., Home Box Office, Inc., Hulu, LLC, Netflix, Inc., and Valve Corporation, claiming that certain of these companies' products or services infringe the '960 Patent. It is the sole patent raised. The cases are in their early stages and no schedule or trial date has been set. Uniloc also filed an earlier lawsuit on November 20, 2015 against Electronic Arts Inc. related to the '960 Patent in *Uniloc USA, Inc., et al v. Electronic Arts Inc.*, No. 6:15-cv-01009 (E.D. Tex. Nov. 20, 2015). That lawsuit was dismissed with prejudice on January 12, 2016.

### **C. Counsel**

Vincent J. Galluzzo (Reg. No. 67,830) will act as lead counsel; Teresa Stanek Rea (Reg. No. 30,427) and Jonathan Stroud (Reg. No. 72,518) will act as back-up counsel.

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