UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DISH NETWORK L.L.C.
Petitioner

v.

TQ DELTA LLC
Patent Owner

Case IPR2016-01470
Patent 8,611,404

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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List of Exhibits

Exhibit No.	Description of Document
1058	Deposition Transcript of Dr. Douglas A. Chrissan on August 11, 2017.
1059	Copy of Deposition Transcript of Dr. Douglas A. Chrissan filed in IPR2016-01466 on August 23, 2017 as Ex. 1011.
1060	Dictionary of Networking, Third Edition (1999).
1061	Claim Construction Order filed in *TQ Delta, LLC v. Comcast Cable Communications, LLC*, Case Nos. 15-cv-611, 15-cv-612, 15-cv-613, 15-cv-614, 15-cv-615, 15-cv-616 (D. Del.) dated Dec. 6, 2016.

I.   INTRODUCTION

Patent Owner's Response ("POR") sets forth new unsupportable proposed claim constructions and uses them to argue that the combination of Bowie, Vanzieleghem, and the 1995 ADSL Standard fails to teach the limitations "stor[ing], in a low power mode, at least one parameter associated with the full power mode operation" (herein, the "storing" claim element), "exit[ing] from the low power mode … without needed to reinitialize the transceiver" (herein, the "exiting" claim element), and "receiv[ing], in the low power mode, a synchronization signal" (herein, the "synchronization signal" claim element). Patent Owner's arguments are based on erroneous claim constructions, mischaracterizations of the prior art and a misinterpretation of the rules of obviousness so they should respectfully be rejected.

II.   CLAIM CONSTRUCTION

A.   Patent Owner's Proposed Construction For "Synchronization Signal" Should Be Rejected

Patent Owner ("PO") proposes a construction for the claimed term "synchronization signal" for the first time in its Response. PO's proposed construction provides for "a signal used to maintain a timing relationship between transceivers by correcting errors or differences between a timing reference of the

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