

Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CISCO SYSTEMS, INC.,
Petitioner,

v.

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

IPR No. IPR2017-00058
U.S. Patent No. 7,805,948 B2

PETITIONER'S REPLY

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III. Claim Construction8

 A. “*generating a conference call request responsively to a single request by the conference call requester*”8

 B. “*conference call request*” identifying “*each of the indicated potential targets*”9

 C. “*instant messaging*”9

 D. “*VoIP address*” (claim 20)9

IV. Hamberg and Lamb disclose “*generating a conference call request responsively to a single request by the conference call requester*”10

 A. An automatically generated CALL ALIAS message does not change Hamberg’s principle of operation.....10

 1. The CALL ALIAS message of the combination continues to initiate a conference call.....11

 2. Hamberg’s mobile station can automatically generate a CALL ALIAS message using status information.....12

 3. The status information of each group member is specific to the group.....13

 B. Hamberg does not teach away from removing a user-customizable aspect of the CALL ALIAS message, but merely teaches an alternative embodiment.15

 C. The Petition addresses, and the prior art teaches, the “conference call request” responsively generated from a “single request by the conference call requester”18

 D. Both the “Call” and “CONF.NOW” buttons teach, independently, a “single request by the conference call requester”19

 E. Hamberg’s CALL ALIAS message identifies “each of the potential targets”20

 F. None of the claims of the ’948 Patent require “a single conference call request ... identifying each of the potential targets.”22

G. Lamb’s “CONF.NOW” button teaches a “*single request*”26

V. Hamberg and Lamb render obvious “*automatically establishing a conference call connection to... each of the potential targets*”27

VI. Hamberg and Lamb render obvious “presenting to said conference call requester a display showing a plurality of potential targets”28

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Petitioner's Exhibit List

October 12, 2017

- 1001 U.S. Patent No. 7,804,948 to Turner
- 1002 Prosecution File History of U.S. Patent No. 7,804,948
- 1003 Declaration of Dr. Henry Houh under 37 C.F.R. § 1.68
- 1004 Curriculum Vitae of Dr. Henry Houh
- 1005 WIPO Patent Publication No. WO/02/21816 to Hamberg
- 1006 U.S. Patent No. 6,747,970 to Lamb *et al.*
- 1007 U.S. Patent No. 6,237,025 to Ludwig *et al.*
- 1008 U.S. Patent Publication No. 2003/0086411 to Vassilovski.
- 1009 Ian Grobel, "SIP is a key part in multimedia sessions," *Network World* (Aug. 12, 2002).
- 1010 Margaret Levine Young, *Internet: The Complete Reference* (2d ed. 2002) (selected pages).
- 1011 C. Anthony DellaFera, "The Zephyr notification service," USENIX Association Winter Conference 1988 Proceedings, pp. 213-220 (Feb., 1988).
- 1012 C. Anthony DellaFera, *Project Athena Technical Plan: Section E.4.1: Zephyr Notification Service*, M.I.T. Project Athena, Cambridge, Massachusetts, (June 5, 1989).
- 1013 R. French and J. Kolh, "The Zephyr Programmer's Manual" draft, (May 5, 1989).
- 1014 Declaration of David Bader
- 1015 Page 61 from Dr. DiEuliis's Declaration (Ex. 2002), annotated by Dr. DiEuliis during deposition.

- 1016 Enlargement of U.S. Patent No. 6,747,970 to Lamb *et al.*, Figure 25 (cols. 109-110).
- 1017 Deposition of Dr. Val DiEuliis (Sept. 26, 2017).
- 1018 K.C. Hopson and S. E. Ingram, *Developing Professional Java Applets*, (1st ed., 1995) (selected pages).
- 1019 D. Flanagan, *Java Foundation Classes, in a Nutshell, A Desktop Quick Reference*, (1st ed., 1999) (selected pages).
- 1020 H. Newton, *Newton's Telecom Dictionary*, (15th ed., 1999) (selected pages).

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