

UNITED STATES PATENT AND TRADEMARK OFFICE

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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GENERAL ELECTRIC CO.  
Petitioner,

v.

GROUPCHATTER, LLC,  
Patent Owner

Patent No. 8,199,740

Issued: June 12, 2012

Filed: June 6, 2011

Inventors: James M. Dabbs, III et al.

Titled: Method and apparatus for efficient and deterministic group alerting

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*Inter Partes* Review No. IPR \_\_\_\_\_

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**PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 8,199,740**

**UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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**EXHIBIT LIST**

<i>Exhibit No.</i>	<i>Description</i>
<b>1001</b>	U.S. Patent No. 7,969,959 to Dabbs, III et al. (“the ’959 Patent”)
<b>1002</b>	U.S. Patent No. 8,199,740 to Dabbs, III et al. (“the ’740 Patent”)
<b>1003</b>	U.S. Patent No. 9,014,659 to Dabbs, III et al. (“the ’659 Patent”)
<b>1004</b>	U.S. Patent No. 8,588,207 to Dabbs, III et al. (“the ’207 Patent”)
<b>1005</b>	U.S. Patent No. 5,748,100 to Gutman et al. (“Gutman”)
<b>1006</b>	U.S. Patent No. 5,918,158 to LaPorta et al. (“LaPorta”)
<b>1007</b>	U.S. Patent No. 7,409,428 to Brabec et al. (“Brabec”)
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<b>1009</b>	Declaration of Bruce Deer
<b>1010</b>	Curriculum Vitae of Bruce Deer
<b>1011</b>	Patent Owner’s November 11, 2015 Complaint against Petitioner
<b>1012</b>	November 23, 2015 Service of Summons and Complaint
<b>1013</b>	Patent Owner’s August 12, 2016 First Amended Complaint against Petitioner
<b>1014</b>	U.S. Provisional App. No. 60/636,094 (“the ’094 Application”)
<b>1015</b>	Patent Owner’s July 20, 2016 Infringement Contentions against Petitioner in the GE Litigation
<b>1016</b>	Motorola Wireless Application Development Document
<b>1017</b>	ReFLEX Wireless Data Technology by USA Mobility (“ReFLEX Paper”)
<b>1018</b>	Patent Owner’s L.P.R. 6.2 Preliminary Claim Constructions in the GE Litigation

**I. INTRODUCTION AND STATEMENT OF RELIEF REQUESTED (37 C.F.R. § 42.22(A))**

General Electric Co. (“Petitioner”) petitions for the institution of *inter partes* review of claims 1-5, 10-16, 20, and 21 (the “Challenged Claims”) of U.S. Patent No. 8,199,740 to James M. Dabbs, III *et al* (“the ’740 Patent,” attached as Ex. 1002). USPTO records indicate that the ’740 Patent is assigned to GroupChatter, LLC (“Patent Owner” or “P.O.”), which is currently asserting the ’740 Patent against Petitioner in a concurrent litigation. *See* Ex. 1013.

**II. MANDATORY NOTICES**

**A. Real Parties-in-Interest**

In addition to General Electric Co., Patent Owner also asserted the ’740 Patent against GE Energy Management Services, LLC and GE Grid Solutions, LLC.

Petitioner identifies General Electric Co. (Petitioner), General Electric International, Inc., Alstom SA, New Alstom Holdings BV, Grid Alliance US Holdings, Inc., Grid Solutions (U.S.) LLC (“Grid Solutions,” which is a joint venture between GE and Alstom SA), and Grid Solutions’ subsidiaries GE Energy Management Services, LLC, GE Grid Solutions, LLC, and Alstom Grid LLC as the real parties-in-interest.

Pursuant to vendor agreements, Petitioner has sent indemnification requests to the following entities: On-Ramp Wireless, Inc., Silver Spring Networks, Inc.,

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