UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION,
Petitioner,

v.

BROADCOM CORPORATION,
Patent Owner.

Case IPR2017-____
Patent 7,616,955 B2

PETITION FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.100

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8 1

A. 37 C.F.R. § 42.8(b)(1): Real Party-in-Interest 1

B. 37 C.F.R. § 42.8(b)(2): Related Matters 1

C. 37 C.F.R. § 42.8(b)(3): Counsel Information 1

D. 37 C.F.R. § 42.8(b)(4): Service Information 2

II. PAYMENT OF FEES UNDER 37 C.F.R. § 42.103 3

III. GROUNDS FOR STANDING UNDER 37 C.F.R. § 42.104(A) 3

IV. IDENTIFICATION OF CHALLENGE UNDER 37 C.F.R. § 42.104(B) 3

A. 37 C.F.R. § 42.104(b)(1): Claims for Which IPR Is Requested 3

B. 37 C.F.R. § 42.104(b)(2): Grounds for Challenge 3

C. 37 C.F.R. § 42.104(b)(3): Claim Construction 4

D. 37 C.F.R. § 42.104(b)(4): How the Claims Are Unpatentable 5

E. 37 C.F.R. § 42.104(b)(5): Evidence Supporting Challenge 5

V. BACKGROUND 5

A. Overview of the '955 Patent 5

1. Subject Matter of the '955 Patent 5

2. Prosecution of the '955 Patent 6

B. Overview of the Prior Art 7

1. Ling 7

2. Walton 8

3. Kim 10

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

C. Level of Ordinary Skill 11

VI. CLAIM CONSTRUCTION.....11

VII. HOW THE CHALLENGED CLAIMS ARE UNPATENTABLE 13

A. Ground 1: Claims 1–27, 29, and 30 Are Anticipated By Ling 13

1. Independent Claim 1 13

2. Dependent Claim 2 20

3. Dependent Claim 3 21

4. Dependent Claim 4 22

5. Dependent Claim 5 23

6. Dependent Claim 6 24

7. Dependent Claim 7 26

8. Dependent Claim 8 27

9. Dependent Claim 9 28

10. Dependent Claim 10 29

11. Independent Claim 11 31

12. Dependent Claim 12 35

13. Dependent Claim 13 35

14. Dependent Claim 14 36

15. Dependent Claim 15 37

16. Dependent Claim 16 38

17. Dependent Claim 17 39

18. Dependent Claim 18 40

19. Dependent Claim 19 41

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

20. Dependent Claim 20 42

21. Independent Claim 21 43

22. Dependent Claim 22 46

23. Dependent Claim 23 48

24. Dependent Claim 24 49

25. Dependent Claim 25 49

26. Dependent Claim 26 50

27. Dependent Claim 27 51

28. Dependent Claim 29 52

29. Dependent Claim 30 53

B. Ground 2: Claims 23, 27-29 Are Obvious Over Ling In Light Of Walton 54

1. Motivation to Combine Ling and Walton 54

2. "comprising a processor is operable to compute said first coding rate in said transmitter based on said received feedback information for transmitting said at least a portion of said subsequent data" (claim 23) 56

3. "comprising a processor is operable to compute at least a second coding rate in said transmitter based on said received feedback information for transmitting at least a remaining portion of said subsequent data" (claim 27 and dependent claim 29) 57

4. "wherein said processor is operable to code at least a portion of said assigned bits utilizing said second coding rate in said transmitter" (claim 28) 58

5. Secondary Conditions 58

C. Ground 3: Claims 1–30 Are Obvious Over Ling In Light Of Kim And Walton 59

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

1. Motivation to Combine Kim with Ling and Walton 59

2. "assigning bits for transmission via said plurality of transmitting antennas based on said feedback information" (claim 1) / "said transmitted feedback information is utilized to assign bits for transmission via at least one of said plurality of RF channels" (claim 11) / "said transmitter is operable to assign bits for transmission via said plurality of transmitting antennas based on said feedback information" (claim 21) 60

3. Dependent Claims 2–10, 12–20, and 22–30 63

VIII. CONCLUSION 63

DOCKET ALARM Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.