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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION, SAMSUNG ELECTRONICS CO. LTD.,
SAMSUNG ELECTRONICS AMERICA, INC. AND ZTE (USA), INC.,
Petitioners

v.

IXI IP, LLC,
Patent Owner

Case No. IPR2017-00898
U.S. Patent 7,552,124

**PATENT OWNER'S PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. § 42.107**

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PATENT OWNER'S TABLE OF EXHIBITS

Exhibit No.	Exhibit Description
2001	Institution Decision dated March 8, 2017 in IPR2016-01669 (Paper 9).

Pursuant to 37 C.F.R. § 42.107, the Patent Owner, IXI IP, LLC (“Patent Owner”) hereby submits the following Preliminary Response to the Petition (“the 898 Petition”) seeking *inter partes* review of U.S. Patent No. 7,552,124 (“the ’124 Patent”). This filing is timely under 35 U.S.C. § 313 and 37 C.F.R. § 42.107, as it is being filed within three months of the mailing date of the Notice of Filing Date Accorded to the Petition (Paper 10), mailed March 14, 2017.

I. INTRODUCTION

The 898 Petition challenges claims 1-10 of the ’124 Patent on the following grounds:

1. Claims 1-10 are allegedly obvious over U.S. Patent No. 7,003,463 of Maes *et al.* (Ex. 1005, “*Maes*”) in view of U.S. Patent No. 5,937,383 of Ittycheriah *et al.* (Ex. 1010, “*Maes II*”)¹ and U.S. Pub. No. 2003/0046061 of Preston *et al.* (Ex. 1006, “*Preston*”); and
2. Claims 1-10 are allegedly obvious over U.S. Patent No. 7,027,975 of Pazandak *et al.* (Ex. 1007, “*Pazandak*”) in view of U.S. Pub. No. 2002/0072918 of White *et al.* (Ex. 1008, “*White*”) and U.S. Patent No. 7,085,708 of Manson (Ex. 1009, “*Manson*”).

¹ Though Abraham Ittycheriah is the first named inventor of U.S. Patent No. 5,937,383, Patent Owner refers to Exhibit 1010 throughout this paper as “*Maes II*” to maintain consistency with Petitioners’ designation. *See* 898 Petition at viii.

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