

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Hytera Communications Corp. Ltd.

Petitioner,

v.

Motorola Solutions, Inc.

Patent Owner

Patent No. 7,369,869 B2
Filing Date: July 26, 2004
Issue Date: May 6, 2008

Title: Method and System of Scanning a TDMA channel

Case No. IPR2017-02179

PETITION FOR *INTER PARTES* REVIEW

I.	PRELIMINARY STATEMENT	1
II.	STATEMENT OF PRECISE RELIEF REQUESTED FOR EACH CLAIM CHALLENGED	5
	A. Prior Art Patents and Printed Publications.....	5
	B. Statutory Grounds of Challenge.....	5
III.	THE '869 PATENT	6
	A. Background	6
	B. Disclosure.....	6
	C. Prosecution History	8
IV.	LEVEL OF ORDINARY SKILL	9
V.	CLAIM CONSTRUCTION	9
	A. Constructions Proposed in Co-Pending Litigation.....	10
	B. Proposed constructions for this proceeding	10
VI.	CLAIMS 1-4, 6-9, 17-18, and 21-22 OF THE '869 PATENT ARE UNPATENTABLE OVER THE PRIOR ART	11
	A. Ground 1: <i>Wan</i> Anticipates Claims 1-3, 6-8, 17-18, and 21-22; Ground 2: <i>Wan</i> Renders Obvious Claims 1-4, 6-9, 17-18, and 21-22.....	11
	1. Claim 1	11
	2. Claim 2	27
	3. Claim 3	28
	4. Claim 4	29
	5. Claim 6	32
	6. Claim 7	34
	7. Claim 8	35

8.	Claim 9	35
9.	Claim 17	37
10.	Claim 18	42
11.	Claim 21	43
12.	Claim 22	47
B.	Ground 3: <i>Wan</i> in Combination with <i>Brennan</i> Renders Claims 1-4, 6-9, 17-18, and 21-22 Obvious	47
1.	<i>Wan</i> in Combination with <i>Brennan</i> Renders Claim Elements 1[a] and 21[a] Obvious	48
2.	<i>Wan</i> in Combination with <i>Brennan</i> Renders Claim 2 Obvious	50
3.	<i>Wan</i> in Combination with <i>Brennan</i> Renders Claim 6 and Claim Elements 17[d]-[e] Obvious.....	51
4.	<i>Wan</i> in Combination with <i>Brennan</i> Renders Claims 3-4, 7-9, 18, and 22 Obvious	54
VII.	MANDATORY NOTICES	55
A.	Real Party-in-Interest	55
B.	Related Matters.....	55
C.	Lead and Back-Up Counsel, and Service Information	55
VIII.	GROUNDS FOR STANDING.....	56
IX.	CONCLUSION	56

LIST OF EXHIBITS

Ex. 1001	U.S. Patent No. 7,369,869 to David G. Wiatrowski et al.
Ex. 1002	Patent Prosecution History of U.S. Patent No. 7,369,869.
Ex. 1003	U.S. Patent No. 6,044,069 to Yongbing Wan (“Wan”).
Ex. 1004	Declaration of Dr. Robert Akl. D.Sc.
Ex. 1005	U.S. Patent No. 6,519,472 to Terence Brennan et al. (“Brennan”).
Ex. 1006	Corrected Joint Claim Construction Chart, Investigation No. 337-TA-1053 (ITC Aug. 25, 2017).
Ex. 1007	Hytera Respondents’ Initial Claim Construction Brief, Investigation No. 337-TA-1053 (ITC Sept. 6, 2017).
Ex. 1008	Complainant Motorola Solutions Inc.’s Opening Claim Construction Brief, Investigation No. 337-TA-1053 (ITC Sept. 6, 2017).

Petitioner Hytera Communications Corp. Ltd. requests *inter partes* review of claims 1-4, 6-9, 17-18, and 21-22 of the '869 patent (Ex. 1001), currently assigned to Motorola Solutions, Inc.

I. PRELIMINARY STATEMENT

The '869 patent is directed to a method and system in which a subscriber unit (“SU”) in a wireless communications landscape scans a time division multiple access (“TDMA”) channel. Ex. 1001, Abstract, 8:9-10; 9:30-31; 10:10-12. The '869 patent acknowledges that a subscriber unit scanning specific preprogrammed RF frequencies, or channels, for voice and data communications of interest was well known before its effective filing date. Ex. 1001, 1:27-29. As the '869 patent further acknowledges, “the scanning SU spends a lot of time listening to communications that are of no interest to it” because “the preprogramed scan list is very long and has many frequencies” and “many of the RF communications are normally of no interest to the scanning SU.” Ex. 1001, 1:34-39.

The '869 patent purports to solve this alleged problem by reducing the amount of time a subscriber unit spends scanning a TDMA channel. Ex. 1001, 1:44-46. In particular, the '869 patent claims a subscriber unit operatively connected a base radio over a plurality channels, the subscriber unit locking onto a channel of the plurality of channels, and transmitting from the base radio to the subscriber unit a control message including first information which informs the

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