IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DTS, INC. AND PHORUS, INC., Petitioners,

v.

AVAGO TECHNOLOGIES GENERAL IP (SINGAPORE) PTE. LTD., Patent Owner.

Case No. To Be Assigned Patent No. 6,684,060

PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,684,060 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 et seq.



Exhibit	Description
Ex. 1001	U.S. Patent No. 6,684,060 (the "'060 patent")
Ex. 1002	File History for U.S. Patent No. 6,684,060
Ex. 1003	File History for European Patent Application No. 01303365.9-
	2225
Ex. 1004	U.S. Patent Application Publication No. 2004/0223622
	("Lindemann")
Ex. 1005	U.S. Patent No. 5,832,024 ("Schotz")
Ex. 1006	U.S. Patent No. 6,922,730 ("Yaple")
Ex. 1007	File History For U.S. Patent Application No. 09/707,616
Ex. 1008	U.S. Provisional Application No. 60/110,705
Ex. 1009	U.S. Patent No. 5,946,343 ("Schotz 343")
Ex. 1010	Declaration of Stuart Lipoff
Ex. 1011	Curriculum vitae of Stuart Lipoff

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VI.		There is a Reasonable Likelihood that Petitioners Will Prevail as to at Least One Claim of the '060 Patent			
	A.	Prior Art			
		1.	<i>Lindemann</i> (Ex. 1004)		
		2.	<i>Schotz</i> (Ex. 1005)		
		3.	<i>Yaple</i> (Ex. 1006)		
	В.	Ground I: Claims 1-2, 4, 6–8, 10, 12–14, 16, 18–21, 23–27, 29 are Unpatentable as Obvious over <i>Lindemann</i>			
		1.	Independent Claims 1 and 7		
		2.	Independent Claim 13		
		3.	Independent Claim 1941		
		4.	Independent Claim 24		
		5.	Dependent Claim 25: "The system as recited in claim 24 further comprising: a plurality of speaker modules, located on said premises, that receives said encoded audio channel and decodes respective ones of said plurality of audio channels therefrom.".56		
		6.	Dependent Claims 2, 8, 14, 20, 26: "wherein said power source is a line power source for said [premises / theater]"		
		7.	Dependent Claims 4, 10, 16, 21, 27: "wherein [said speaker module / each of said plurality of speaker modules / said digital audio receiver/decoder] further includes a channel selector, [coupled to said digital audio receiver/decoder / coupled to each of said plurality of digital audio receiver/decoder], that identifies [an audio channel / one of said plurality of audio channels] to be decoded from said [stream / encoded audio channel]" / "identifying an audio channel to be decoded from said stream" 57		
		8.	Dependent Claims 6, 12, 18, 23, 29: "wherein said [encoded] audio channel conforms to a standard selected from the group		

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			Dolby® Stereo, Dolby® Digital 5.1 Surround, DTS [™] Surround 5.1, PAC Stereo Audio, and MP-3 Stereo Audio."60	
	C.	Ground II: Claims 5, 11, 17, 22, 28 are Unpatentable as Obvious over <i>Lindemann</i> Alone or in Combination with <i>Yaple</i> 61		
		1.	Dependent Claims 5, 11, 17, 22, 28: "wherein said stream conforms to a Bluetooth TM standard" / "wherein said digital encoded audio transmitter wirelessly transmits said encoded audio channel according to a Bluetooth TM standard"	
	D.		and III: Claims 3, 9 and 15 are Unpatentable as Obvious Over <i>emann</i> in view of <i>Schotz</i>	
		1.	Dependent Claims 3, 9 and 15: "wherein said digital audio encoder/transmitter includes an analog to digital converter that generates said audio channel in digital form."	
	Е.		Ground IV: Claims 1-3, 6, 19-20, and 23 are Unpatentable as Obvious over <i>Schotz</i>	
		1.	Independent Claim 171	
		2.	Independent Claim 1985	
		3.	Dependent Claims 2 and 20: "wherein said power source is a line power source for said premises"	
		4.	Dependent Claim 3: "wherein said digital audio encoder/transmitter includes an analog to digital converter that generates said audio channel in digital form."	
		5.	Dependent Claims 6 and 23: "wherein said audio channel conforms to a standard selected from the group consisting of: two-channel stereo, four-channel quadraphonic, Dolby® Stereo, Dolby® Digital 5.1 Surround, DTS TM Surround 5.1, PAC Stereo Audio, and MP-3 Stereo Audio."	
VII.	Conc	lusion		

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