

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.
Petitioner

v.

MOBILITY WORKX, LLC
Patent Owner.

Case IPR2018-01150
Patent 8,213,417

PATENT OWNER'S SUR-REPLY

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EXHIBIT LIST

| Exhibit No. | Description |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| 2001 | Screenshot of http://www.unifiedpatents.com/npe/ downloaded July 16, 2018. |
| 2002 | Screenshot of http://www.unifiedpatents.com/npe/ downloaded August 31, 2018. |
| 2003 | Screenshot of http://www.unifiedpatents.com/success downloaded July 16, 2018. |
| 2004 | Screenshot of http://www.unifiedpatents.com/home downloaded July 16, 2018. |
| 2005 | Declaration of Suku Nair, Ph.D., PE. |
| 2006 | CV of Suku Nair, Ph.D, PE. |

I. ARGUMENT

A. Petitioner, Not Patent Owner, Misunderstands the Art.

Contrary to UPI's assertions, Reply at p. 2, it is Petitioner, not Patent Owner, that misunderstand the art it relies upon. The '417 patent is concerned with "reduc[ing] registration overhead and setup times associated with mobile node handoffs." Ex. 1001 at 3:54-55. This is accomplished, in part, using ghost-foreign agents to advertise the presence of foreign agents in a network to make a mobile node aware of the foreign agents' presence before the mobile node actually arrives in a region covered by the foreign agent. *Id.* at 4:1-7. In Liu, on the other hand, a mobile node specifies its intention to move to a new location and instructs its associated M-agent to set up an MF-agent at that new location so that data files being accessed by the mobile node can be cached, awaiting the mobile node's arrival.¹ Ex. 1003 at 7:26-35. Rather than relying upon an MF-agent to make it aware of the presence of a foreign agent, in Liu a mobile node dictates the establishment of an MF-agent to act on behalf of the mobile node's M-agent

¹ In some cases, a previously created MF-agent may be used, Ex. 1003 at 7:39-44, but all MF-agents are first created at the request of a mobile terminal and have only designated times to live. *Id.* at 7:32-36; 8:48 – 9:2.

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