

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION,
Petitioner,

v.

UNILOC 2017 LLC,
Patent Owner.

IPR2019-00744
Patent 7,167,487

**PETITIONER'S REPLY IN SUPPORT OF ITS
MOTION FOR JOINDER WITH CASE IPR2019-00222**

TABLE OF CONTENTS

	Page
LIST OF EXHIBITS.....	iii
I. UNILOC’S CLAIMS OF UNDUE PREJUDICE LACK MERIT.....	1
II. THE <i>GENERAL PLASTIC</i> FACTORS DO NOT WEIGH IN FAVOR OF DENIAL IN THIS CASE	3
III. MICROSOFT FACES PREJUDICE IF JOINDER IS DENIED AND ITS CHALLENGES ARE NOT SEPARATELY CONSIDERED BY THE BOARD.....	4
IV. CONCLUSION.....	5

TABLE OF AUTHORITIES

Page(s)

Cases

Facebook, Inc. v. Windy City Innovations, LLC,
CAFC-18-1400 (Fed. Cir. argued August 7, 2019).....2

Board Decisions

General Plastic Industrial Co. v. Canon Kabushiki Kaisha,
Case IPR2016-01357 (PTAB Sept. 6, 2017).....3

Valve Corp. v. Elec. Scripting Prods., Inc.,
Case IPR2019-00062 (PTAB Apr. 2, 2019).....3, 4

Rules

37 C.F.R. 3162, 3

LIST OF EXHIBITS

No.	Description
1001	U.S. Patent No. 7,167,487 (“ the ’487 Patent ”)
1002	File History of U.S. Patent No. 7,167,487
1003	Declaration of Fabio Chiussi, PhD., signed and dated March 1, 2019 (“ Chiussi Decl. ” or “ Chiussi ”)
1004	Declaration of Friedhelm Rodermund, signed and dated February 27, 2019 (“ Rodermund Decl. ” or “ Rodermund ”)
1005	U.S. Patent No. 6,850,540 B1 to Peisa et al. (“ Peisa ”)
1006	3GPP TS 23.107 V3.5.0 (2000-12), “3rd Generation Partnership Project; Technical Specification Group Services and System Aspects; QoS Concept and Architecture (Release 1999)” (“ TS23.107 ”)
1007	3GPP TS 25.302 V3.6.0 (2000-09), “3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Services provided by the physical layer (Release 1999)” (“ TS25.302 ”)
1008	3GPP TS 25.321 V3.6.0 (2000-12), “3rd Generation Partnership Project; Technical Specification Group Radio Access Network; MAC protocol specification (Release 1999)” (“ TS25.321 ”)
1009	N/A
1010	Mitsubishi Electric Telecom (Trium R&D), R2-010182 “Corrections to logical channel priorities in MAC protocol,” Change Request for 3GPP TS 25.321 V3.6.0, 3GPP TSG-WG2 Meeting #18, Edinburgh, Scotland, 17th-19th January 2001, as available at http://www.3gpp.org/ftp/tsg_ran/WG2_RL2/TSGR2_18/Docs/Zips/ (“ R2-010182 ”)

1011	3GPP TS 25.301 V3.6.0 (2000-09), “3rd Generation Partnership Project; Technical Specification Group Radio Access Network, Radio Interface Protocol Architecture (Release 1999)” (“ TS25.301 ”)
1012	Kalliokulju, <i>Quality of service management functions in 3rd generation mobile telecommunication</i> , WCNC. 1999 IEEE Wireless Communications and Networking Conference, Vol. 3 (1999) (“ Kalliokulju ”)
1013	Garg, et al., <i>Integrated QoS Support in 3G UMTS Networks</i> , 2000 IEEE Wireless Communications and Networking Conference. Conference Record, Vol. 3 (2000) (“ Garg ”)
1014	U.S. Patent No. 7,433,334 B2 to Marjelund et al. (“ Marjelund ”)
1015	Hyman, et al., <i>Real-Time Scheduling with Quality of Service Constraints</i> , IEEE Journal on Selected Areas in Communications, Vol. 9 (1991) (“ Hyman ”)
1016	Parekh, et al., <i>A Generalized Processor Sharing Approach to Flow Control in Integrated Services Networks: The Single-Node Case</i> , IEEE/ACM Transactions on Networking, Vol. 1, No. 3 (1993) (“ Parekh ”)
1017	Rexford, et al., <i>Hardware-Efficient Fair Queueing Architectures for High-Speed Networks</i> , Proceedings of IEEE INFOCOM '96, Conference on Computer Communications (1996) (“ Rexford ”)
1018	Stiliadis, et al., <i>Design and Analysis of Frame-based Fair Queueing: A New Traffic Scheduling Algorithm for Packet-Switched Networks</i> , ACM SIGMETRICS, Vol. 24 Issue 1 (1996) (“ Stiliadis ”)
1019	Sachs, et al., <i>Congestion Control in WCDMA with Respect to Different Service Classes</i> , Proc. European Wireless '99 and ITG Fachtagung Mobile Kommunikation, (1999) (“ Sachs ”)

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.