UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Unified Patents Inc. Petitioner

v.

Sound View Innovations, LLC, Patent Owner

> Case IPR2019-0113 U.S. Patent 6,034,621

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,034,621

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LIST OF EXHIBITS

Exhibit	Description
Ex. 1001	U.S. Patent No. 6,034,621 to Kaufman et al. ("the '621 patent")
Ex. 1002	Prosecution History of U.S. Patent No. 6,034,621
Ex. 1003	Petitioner's Voluntary Interrogatory Responses
Ex. 1004	Declaration of Harley R. Myler, Ph.D., ("Myler")
Ex. 1005	C.V. of Harley R. Myler
Ex. 1006	U.S. Patent No. 5,666,530 to Clark et al. ("Clark")
Ex. 1007	U.S. Patent No. 6,034,621 to Cashman ("Cashman")
Ex. 1008	U.S. Patent No. 5,991,771 to Falls et al. ("Falls")
Ex. 1009	U.S. Patent No. 6,134,454 to Foladare et al. ("Foladare")
Ex. 1010	U.S. Patent No. 5,790,952 to Seazholtz et al.
Ex. 1011	Microsoft Computer Dictionary, 3rd edition, 1997

I. Introduction

Petitioner Unified Patents Inc. ("Petitioner") requests *inter partes* review of claims 1-8, 10-18, 20-38, 40-44 ("challenged claims") of U.S. Patent 6,034,621 (Ex. 1001, "the '621 patent"). The '621 patent is directed to a portable computing device such as a PDA that synchronizes a data file of the PDA with a data file of a host computer over a pager or mobile telephone. As described below, such portable computing devices and synchronization techniques were well known before the '621 patent was filed.

II. Requested Relief

Petitioner respectfully requests *inter partes* review under 35 U.S.C. § 311 of the challenged claims of the '621 patent and cancellation of those claims as unpatentable in view of the following references and grounds:

Primary Prior Art References ¹				
Clark	U.S. Patent 5,666,530, issued Sep. 9, 1997, filed on Dec. 2, 1992 (Ex. 1006).			
Cashman	U.S. Patent 6,334,062, issued Dec. 25, 2001, filed on Jun. 7, 1995 (Ex. 1007).			

¹ *Clark*, *Cashman*, *Foladare*, and *Falls* each qualify as prior art under at least 35 U.S.C. § 102(a), (b), and/or (e).

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