UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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BLACKBERRY CORP.,

Petitioner,

v.

UNILOC 2017 LLC,

Patent Owner.

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Case No. IPR2019-01283
Patent No. 7,167,487

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**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,167,487**

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EX-1004 Prosecution History of U.S. Patent No. 7,167,487 ("the Prosecution History")

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EX-1006 Declaration of Craig Bishop ("Bishop")

EX-1007 3GPP TS 25.321 V3.6.0 (2000-12) Technical Specification, "3rd Generation Partnership Project; Technical Specification Group Radio Access Network; MAC protocol specification (Release 1999)" ("TS25.321")

EX-1008 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 ("R2- 010182")

EX-1009 3GPP TS 25.302 V3.6.0 (2000-09) Technical Specification, "3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Services provided by the physical layer (Release 1999)" ("TS25.302")

EX-1010 3GPP Portal, Specification #: 25.321, Versions, https://portal.3gpp.org/desktopmodules/Specifications/ SpecificationDetails.aspx?specificationId=1175

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EX-1013   United States Patent No. 6,850,540 B1 to Peisa et al. ("Peisa")

EX-1014   RESERVED

EX-1015   Holma and Toskala, "WCDMA for UMTS", Wiley, 2000 (excerpts) ("Holma")

EX-1016   F. Muratore, "UMTS: Mobile Communications for the Future", Wiley, 2001 ("Muratore")

EX-1017   K. Washburn and J. Evans, "TCP/IP: Running a successful network", Addison-Wesley, 1996 (excerpts) ("Washburn")

I.   INTRODUCTION

BlackBerry Corp. ("Petitioner") requests *Inter Partes* Review

("IPR") of claims 11-13 ("the Challenged Claims") of U.S. Patent No.

7,167,487 ("the '487 Patent").

II.   CHALLENGE AND RELIEF REQUESTED

A.   Proposed Grounds and Prior Art

Petitioner requests IPR of the Challenged Claims on the following

pre- AIA 35 U.S.C. §103(a) grounds, as explained below and in the

Declaration of Prof. R. Michael Buehrer (EX-1002), and in which Prof.

Buehrer has also provided a detailed tutorial to orient the Board to the

relevant technology. *See, e.g.*, Buehrer, ¶¶27-50.

Ground	'487 Claims	§103(a) Prior Art Basis
1	11-13	TS 25.321 v3.6.0 (2000-12), R2-010182 and TS 25.302 v3.6.0 (2000-09)
2	11-13	US 6,850,540 (Peisa)

The earliest proclaimed priority date of the '487 Patent is May 21,

2001. As shown below, each reference pre-dates this date and qualifies

as prior art at least under the bases set forth below. *See also* Bishop,

§§II-VII.

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