

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: Robert J. Davies
U.S. Patent No.: 6,993,049 Attorney Docket No.: 19688-0058IP1
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Title: COMMUNICATION SYSTEM

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 6,993,049 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

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EXHIBITS

- LG-1001 U.S. Patent No. 6,993,049 to Davies (“’049 Patent”)
- LG-1002 Prosecution History of the ’049 Patent (“the Prosecution History”)
- LG-1003 Declaration of Dr. Charles Knutson
- LG-1004 Curriculum Vitae of Dr. Charles Knutson
- LG-1005 U.S. Patent No. 6,704,293 (“Larsson”)
- LG-1006 IrDA Object Exchange Protocol (“IrOBEX”)
- LG-1007 Prosecution History of the 7,587,207 Patent (“207 Prosecution History”)
- LG-1008 Second Declaration of Dr. Charles Knutson
- LG-1009 U.S. Patent No. 7,587,207 (“Davies” or the “’207 Patent”)
- LG-1010 U.S. Patent No. 6,570,857 (“Haartsen”)
- LG-1011 U.S. Patent No. 6,480,505 (“Johansson”)
- LG-1012 Specification of the Bluetooth System: Wireless connections made easy, Profiles, Vol. 2, Bluetooth, Dec. 1, 1999 (“BT Profiles”)
- LG-1013 The New Shorter Oxford English Dictionary on Historical Principles, Vol. 1, Clarendon Press, 1993 (“Oxford Dictionary”)
- LG-1014 Specification of the Bluetooth System: Wireless connections made easy, Core, Vol. 1, Bluetooth, Dec. 1, 1999 (“BT Core”)

- LG-1015 U.S. Patent No. 6,683,886 (“Tuijn”)
- LG-1016 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/specification.asp> from March 1, 2000
- LG-1017 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/core.asp> from March 1, 2000
- LG-1018 Internet Archive Capture of <http://www.bluetooth.com:80/developer/specification/order.asp> from March 1, 2000
- LG-1019 Internet Archive Capture of <http://www.bluetooth.com:80/news/archive/archive.asp> from March 4, 2000

LG Electronics, Inc. (“**LG**” or “**Petitioner**”) petitions for *Inter Partes*

Review (“**IPR**”) of claims 11 and 12 (“the Challenged Claims”) of U.S. Patent No. 6,993,049 (“**’049 Patent**”). As explained in this petition, there exists a reasonable likelihood that Petitioner will prevail with respect to at least one of the Challenged Claims.

The Challenged Claims are unpatentable based on teachings set forth in at least the references presented in this petition. LG respectfully submits that an IPR should be instituted, and that the Challenged Claims should be canceled as unpatentable.

I. REQUIREMENTS FOR IPR UNDER 37 C.F.R. § 42.104

A. Grounds for Standing Under 37 C.F.R. § 42.104(a)

Petitioner certifies that the ’049 Patent is available for IPR, and that Petitioner is not barred or estopped from requesting IPR of the Challenged Claims on the grounds identified in this petition. Petitioner was first served with a complaint of infringement of the ’049 patent less than one year prior to the filing of this Petition.

B. Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested

Petitioner requests IPR of the Challenged Claims based on the following grounds:

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