UNITED STATES PATENT AND TRADEMARK OFFICE

_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD

_____

APPLE INC.
Petitioner,

v.

OPTIS CELLULAR TECHNOLOGY, LLC
Patent Owner.

_____

Case IPR2020-00465
Patent No. 8,102,833

_____

PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF CONTENTS

EXHIBIT LIST

Ex. 2001	Declaration of Professor Vijay Madisetti in Support of Patent Owner's Preliminary Response
Ex. 2002	2020-06-09 Docket Control Order in parallel district court action
Ex. 2003	Judge Gilstrap's Standing Order Regarding Pretrial Procedures in Civil Cases During the Present COVID-19 Pandemic
Ex. 2004	Law360 Article on Judge Gilstrap's readiness for resuming trial in June
Ex. 2005	2020-04-07 Claim Construction Order in parallel district court action
Ex. 2006	Claim Construction Order in *Optis Cellular Technology LLC et al. v. Kyocera Corporation*, 2:16-cv-0059-JRG-RSP (E.D. Tex.)
Ex. 2007	Email from Apple litigation counsel electing prior art combinations in the parallel district court case
Ex. 2008	Table of Contents for Dr. Jonathan Wells' Invalidity Report Of the '833 Patent
Ex. 2009	Excerpt of 2019-08-19 Apple's Invalidity Contentions
Ex. 2010	3GPP TS 36.212 v8.1.0 (2007-11)
Ex. 2011	3GPP TS 36.212 v8.3.0 (2008-05)
Ex. 2012	3GPP TS 36.212 v8.8.0 (2009-12)
Ex. 2013	3GPP Tdoc R1-08267, "PUSCH multiplexing of data, control and ACK/NACK information" by LG Electronics, submitted to 3GPP TSG RAN WG1 #51bis
Ex. 2014	R1-080631 (Report of 3GPP TSG RAN WG1 #51bis)

Ex. 2015	2008-01-30 Email from Daewon Lee
Ex. 2016	2008-01-30 Email from Daewon Lee
Ex. 2017	2008-01-30 Email from Stefan Parkvall of Ericsson in response to Daewon Lee exchange
Ex. 2018	3GPP R1-080871, "Summary of email discussion on UL control signaling" submitted for discussion to TSG-RAN WG1 #52
Ex. 2019	3GPP R1-081004, "Multiplexing of ACK/NACK in PUSCH," submitted by LG Electronics to TSG-RAN WG1 #52
Ex. 2020	3GPP R1-081005, "Multiplexing of Control and Data in PUSCH," submitted by LG Electronics to TSG-RAN WG1 #52
Ex. 2021	R1-081166, "Report of 3GPP TSG RAN WG1 #52"
Ex. 2022	R1-081157, Change Request to TS 36.212 v8.1.0
Ex. 2023	Stefan Parkvall biography on IEEE Xplore
Ex. 2024	R1-081732, "Multiplexing of Rank and CQI/PMI in PUSCH Channel," submitted to 3GPP TSG-RAN Working Group 1#53 (May 2008)
Ex. 2025	R1-080002, "Draft Report of 3GPP TSG RAN WG1 #51"
Ex. 2026	Tdoc list for RAN#51 (November 2007)
Ex. 2027	R1-075111, Change Request to TS 36.212, v. 8.0.0
Ex. 2028	Directory Listing for TSG RAN WG1 #51 meeting, showing R1-075111 (Ex. 2027) had a date of "2007/11/22" associated with it
Ex. 2029	(Gilstrap) Order denying request for stay of trial because of Covid-19

Ex. 2030	2020-07-07 Email exchange between Patent Owner and Petitioner regarding filings of replies in support of summary judgment motions and motions to exclude/strike
Ex. 2031	2020-07-03 Apple's Identification of Prior Art pursuant to 35 USC § 282
Ex. 2032	2020-07-02 Email from Sheasby to Apple Counsel
Ex. 2033	Texas Coronavirus Map and Case Count, New York Time, July 7, 2020, 2:10 P.M. E.T.
Ex. 2034	U.S. Patent No. 8,467,367, issued June 18, 2013 to Malladi et al. ("Malladi-367")
Ex. 2035	U.S. Patent No. 8,374,161, issued Feb. 12, 2013 to Malladi, ("Malladi-161")
Ex. 2036	2020-07-07 Email from Board authorizing Patent Owner to file sur-replies (with required page limits) in IPR2020-00465, IPR2020-00466, IPR2020-00642
Ex. 2037	Excerpt of Expert Report of DR. Jonathan Wells Regrading Invalidity Of US Patent No. 8,102,833
Ex. 2038	Excerpt of Apple's 2nd Amended Invalidity Contentions dated March 31, 2020
Ex. 2039	Excerpt of Rebuttal Expert Report of Dr. Vijay Madisetti Regarding Invalidity Of US Patent No. 8,102,833

DOCKET ALARM

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.