

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELL INC.,
ZTE (USA) INC.,
and
ZTE CORPORATION,
Petitioners,

v.

3G LICENSING S.A.,
Patent Owner.

Case No. IPR2021-01157

U.S. Patent No. 7,274,933

**Petitioners' Opposition to
Patent Owner's Motion to Amend Under 37 C.F.R. § 42.121**

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 7,274,933 (“the ’933 patent”)
1002	Copy of Prosecution History of the ’933 patent
1003	Declaration of Dr. Apostolos Kakaes
1004	U.S. Patent Appl. Publ. No. 2003/0022689 (“McElwain”)
1005	U.S. Patent Appl. Publ. No. 2004/0204136 (“Uchida”)
1006	U.S. Patent No. 7,027,813 (“Hicks”)
1007	3rd Generation Partnership Project; Technical Specification Group Core Network; NAS Functions related to Mobile Station (MS) in idle mode (Release 5) (3GPP TS 23.122 V5.2.0) (“TS-23.122”)
1008	3rd Generation Partnership Project; Technical Specification Group Services and System Aspects – Service aspects; Service principles (Release 5) (3GPP TS 22.101 V5.8.0) (“TS-22.101”)
1009	3rd Generation Partnership Project; Technical Specification Group Terminals; Characteristics of the USIM Application (Release 5) (3GPP TS 31.102 V5.3.0) (“TS-31.102”)
1010	Declaration of Craig Bishop
1011	Complaint for Patent Infringement, No. 1:19-cv-01247-LPS (D. Del. July 1, 2019)
1012	Complaint for Patent Infringement, No. 3:19-cv-01694 (N.D. Tex. July 15, 2019)
1013	Amended Complaint for Patent Infringement, No. 1:19-cv-01140-MN (D. Del. July 15, 2019)
1014	Third Amended Complaint for Patent Infringement, No. 1:19-cv-01144-MN (D. Del. Feb. 28, 2020)
1015	Amended Complaint for Patent Infringement, No. 1:20-cv-20813 (S.D. Fl. Mar. 25, 2020)
1016	EIA/TIA-553 Standard (AMPS)
1017	Excerpts from EIA/TIA/IS-54 Standard (Digital AMPS)

*Petitioners' Opposition to Patent Owner's
Motion to Amend in IPR2020-01157*

Exhibit No.	Description
1018	Excerpts from TIA/EIA/136.1 Standard
1019	Excerpts from TIA/EIA/IS-136.2-A Standard
1020	Excerpts from TIA/EIA/IS-95 Standard
1021	Excerpts from T. Halonen et al., "GSM, GPRS and EDGE Performance: Evolution Towards 3G/UMTS" (2d ed. Wiley 2003)
1022	3rd Generation Partnership Project; Technical Specification Group Terminals Specification of the Subscriber Identity Module – Mobile Equipment (SIM - ME) interface (Release 1999) (3GPP TS 11.11 V8.6.0) ("TS-11.11")
1023	Excerpts from A. Mehrotra, "GSM System Engineering" (Artech House 1997)
1024	U.S. Patent No. 5,950,130 ("the '130 patent")
1025	U.S. Patent No. 5,862,471 ("the '471 patent")
1026	U.S. Patent No. 6,195,532 ("Bamburak")
1027	U.S. Patent Appl. Publ. No. 2001/0001875 ("Hirsch")
1028	U.S. Patent Appl. Publ. No. 2002/0111180 ("Hogan")
1029	Second Declaration of Dr. Apostolos Kakaes
1030	3rd Generation Partnership Project; Technical Specification Group Terminals; Test Specification for 'C'-language binding to (U)SIM API (Release 6) (3GPP TS 34.131 V6.0.0) ("TS-34.131")

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