

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DELL, INC.,

Petitioner

v.

3G LICENSING S.A.,

Patent Owner

Case IPR2020-1157
Patent No. 7,274,933

PATENT OWNER'S SUR-REPLY

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450
Submitted Electronically via PTAB E2E

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TABLE OF AUTHORITIES

Cases	Page(s)
<i>Ericsson Inc. v. Intellectual Ventures I LLC</i> , 901 F.3d 1374 (Fed. Cir. 2018)	6

TABLE OF EXHIBITS

Exhibit	Description
2001	Declaration of Stu Lipoff in Support of Patent Owner
2002	Affidavit of Stephanie Berger
2003	Affidavit of Neil Benchell
2004	Affidavit of Andrew DeMarco
2005	Second Declaration of Stu Lipoff in Support of Patent Owner
2006	3rd Generation Partnership Project; Technical Specification Group Core Network; NAS Functions related to Mobile Station (MS) in idle mode (Release 7) (3GPP TS 23.122 V7.0.0) (“TS 23.122 V7.0.0”)
2007	3rd Generation Partnership Project; Universal Mobile Telecommunications (UMTS); Characteristics of the USIM application (Release 6) (3GPP TS 31.102 V6.8.0) (“TS-31.102 V6.8.0”)
2008	<i>“The North American Official Cellular User’s Guide” Available to Help Cellular Telephone Users, Business Wire, December 18, 1990</i>
2009	<i>Amy Zuckerman, Those Black Holes in Your Mobile Phone Service, New York Times, December 24, 2000</i>
2010	<i>Nancy Gohring, Falling Short of Replacement: Wireless Carrier Plans Compete with Landline but Don’t Cut it Out of the Equation, Telephony, April 27, 1998</i>
2011	<i>Judy Strausbaugh, Oh, Give me a Cell Phone Where the Signals Won’t Roam, Sunday News (Lancaster, PA), May 19, 2002</i>
2012	Settlement Agreement dated August 4, 2021
2013	Third Declaration of Stu Lipoff in Support of Patent Owner

I. INTRODUCTION

Petitioner's Reply generally reiterates their previous arguments and leaves many of Patent Owner's arguments and evidence from its Response un rebutted. The few counter-assertions made by Petitioner to Patent Owner's Response are either new arguments just now raised, or fail to support Petitioner's arguments. Indeed, rather than attempt to refute Patent Owner's position concerning the construction of the term "Home Network Display Name," Petitioner merely restates the Board's position from the Institution Decision. (Paper No. 31 at 3.)

Petitioner's only responsive arguments—pertaining to whether the asserted references disclose displaying a home network display name when a user equipment ("UE") is not on a user's service provider's network—are each unavailing. Specifically, Petitioner's attempts to remedy the shortcomings in the McElwain reference cause more confusion than they resolve; the assertions regarding Uchida contain new arguments that nonetheless fail because they seek to read-out the very purpose of the '933 patent; and Petitioner's arguments regarding Hicks fail to demonstrate why a POSITA would understand the reference to disclose displaying a home network display name. Taken together, these arguments are insufficient to remedy the deficient Petition.

On the subject of whether the asserted references disclose the use of multiple MCC/MNC pairs on an HPLMN list for use in network identification, Petitioner once more leaves most of Patent Owner's arguments and expert testimony from its

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