

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONOS, INC.,
Petitioner,
v.
GOOGLE LLC,
Patent Owner.

U.S. Patent No. 10,229,586
Case No. IPR2021-00964

SONOS, INC.'S REPLY

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LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 10,229,586 to Kates
1002	File History of U.S. Patent No. 10,229,586 to Kates
1003	Declaration of Dr. Stephen B. Wicker
1004	U.S. Publication No. 2006/0120433 A1 to Baker et al.
1005	U.S. Provisional App. No. 60/518,327
1006	WO 00/21053A1 to Marman et al.
1007	Case Management and Pretrial Order for Claims Construction from <i>Google LLC, v. Sonos, Inc.</i> , Case No. 20-cv-03845-EMC (N.D. Cal.)
1008	Time to Trial Statistics for the U.S. District Court for the Northern District of California from 2008-Present
1009	EP 0 416 732 B1 to Bruckert et al.
1010	U.S. Publication No. 2002/0122413 A1 to Shoemake
1011	File History of U.S. App. 15/601,705
1012	File History of U.S. App. 15/090,973
1013	Excerpt from the <i>Authoritative Dictionary of IEEE Standards Terms, Seventh Edition</i> (2000)
1014	Redline comparison of the specifications of U.S. Publication No. 2006/0120433 A1 to Baker et al. and U.S. Provisional App. No. 60/518,327.
1015	U.S. Patent No. 4,585,906 to Matthews et al.
1016	U.S. Patent No. 6,493,824 to Novoa et al.

1017	U.S. Patent No. 6,496,858 to Frailong et al.
1018	U.S. Patent No. 7,027,773 to McMillin
1019	IEEE 802.11 Specification (1999 Edition)
1020	IEEE 802.11a Specification (1999 Edition, R2003)
1021	Akyildiz et. al., “Wireless Mesh Networks: A Survey,” Computer Networks (2004)
1022	Beckman et al., “Use of mobile mesh networks for inter-vehicular communication,” 2003 IEEE 58th Vehicular Technology Conference (VTC 2003-Fall)
1023	IEEE Standards for Local and Metropolitan Area Networks: Overview and Architecture, Std 802-1990 (Dec. 31, 1990).
1024	IEEE Standard for Information Technology, Part 2: Logical Link Control, ANSI/IEEE Std. 802.2 (1998)
1025	U.S. Patent No. 6,115,751 to Tam et al.
1026	U.S. Patent No. 4,941,089 to Fischer
1027	Transcript from the April 20, 2022 Deposition of Dr. Vijay K. Madiseti
1028	Reply Declaration of Dr. Stephen B. Wicker

Petitioner Sonos, Inc. submits this reply to Patent Owner Google LLC's response (Paper 11, "Response")

Patent Owner's response repeatedly and egregiously ignores what the prior art of record teaches. Rather than considering what the art says, and what the Petition argued, it focuses only on select, isolated passages in an effort to save the facially unpatentable claims of the '586 patent.

For instance, Patent Owner argues that Baker does not teach "determining" to relay a received packet based on a comparison between an address in the packet and a stored address. In Patent Owner's view, Baker's network nodes supposedly "always" forward received packets. Baker's nodes do not always forward packets. The nodes only forwards packets if there is a match between the packet's address and that stored in the node's routing table. If there is no match, the packet is not forwarded. This is the claimed "determining." And, Patent Owner simply ignores this functionality.

Likewise, Patent Owner's attempts to distinguish Marman ignore what the reference actually says. According to Patent Owner, Marman would not be understood to employ the claimed "communication packet." Patent Owner characterizes Marman as teaching only the transmission of "disparate," unrelated pieces of information and not a single packet that includes all the parts required. But, in arriving at this conclusion, Patent Owner ignores both Marman's disclosure,



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