



CISCO SYSTEMS, INC. Petitioner,
v.
ZILKR CLOUD TECHNOLOGIES, LLC, Patent Owner

Case No. IPR2023-00822
U.S. Patent No. 9,883,047

Theo Foster and Eugene Goryunov
Haynes and Boone, LLP

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DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Ex.1021 / IPR2023-00822
Cisco Systems, Inc. v. Zilkr Cloud Techs., LLC

'047 Patent – Claim 1

1. A method of provisioning a service for use with a group plan, the method comprising:

receiving, by a unified services platform system, a subscription request for a service for a group plan, wherein the group plan comprises a plurality of telephone numbers, wherein each telephone number of the plurality of telephone numbers is associated with a subscriber, and wherein the service is provided by a third party application service provider system;

sending, by the unified services platform system, an activation request for the group plan to the third party application service provider system,

receiving an activation response from the third party application service provider system;

associating the service with each telephone number of the plurality of telephone numbers;

providing access to the service for each telephone number based on the associating;

receiving, by the unified services platform system, a subscription request for a second service from a subscriber associated with a first telephone number of the plurality of telephone numbers, wherein the second service is provided by a second third party application service provider system;

sending, by the unified services platform system, a second activation request for the service to the second third party application service provider system;

receiving a second activation response from the second third party application service provider system;

associating the second service with the first telephone number; and

providing access to the second service for the first telephone number based on the associating.

Key Points

- Claim construction
- Raleigh renders obvious:
 - a “*subscription request for a service for a group plan*” [1.1]-[1.2]
 - an “*activation request,*” “*activation response,*” “*associating the service,*” and “*providing access to the service*” [1.4]-[1.7]
 - a “*second activation request*” and a “*second activation response*” [1.10]-[1.11]
 - the “*third party application communicates with the network provider system through the unified services platform system*” [5.2]

“subscription request for a service for a group plan” [1.1]-[1.2]

1. A method of provisioning a service for use with a group plan, the method comprising:
receiving, by a unified services platform system, a subscription request for a service for a group plan, wherein the group plan comprises a plurality of telephone numbers, wherein each telephone number of the plurality of telephone numbers is associated with a subscriber, and wherein the service is provided by a third party application service provider system;
sending, by the unified services platform system, an activation request for the group plan to the third party application service provider system,
receiving an activation response from the third party application service provider system;
associating the service with each telephone number of the plurality of telephone numbers;
providing access to the service for each telephone number based on the associating;

FIG. 12 illustrates an embodiment of an activation process in which an enterprise administrator is responsible for activating a service for one or more subscribers. For the

* * *

A request for the service or services is sent from the enterprise administrator 1210 to the provider 1220 in step 1204. The request sent to the provider 1220 may identify the specific services being requested. In addition, a group plan identifier can be included with the request to identify the services as being associated with a group request. Each subscriber identifier such as the telephone number can be associated with the group plan identifier in step 1206. The provider 1220 may receive the request and in turn may generate and send a request in step 1208 to the unified services platform 1240 to source the desired services.

“subscription request for a service for a group plan” [1.1]–[1.2]

Patent Owner Sur-Reply

Contrary to the suggestion in Cisco’s Reply, Zilkr has not argued that the subscription request in claim 1 must list each member of a group, or that the request may not use a group identifier to identify the group. The request must,

by the parties. Zilkr does not disagree that a subscription request may identify members in the group plan using a group plan identifier.

“subscription request for a service for a group plan” [1.1]–[1.2]

Patent Owner Response

Id., 30:64-67. “In response to receiving this request, the unified services platform 1240 may generate the appropriate activation data to activate the requested service and associate the service with the existing telephone numbers of the subscribers in the group plan.” *Id.*, 31:1-5. “Specifically, the unified services platform 1240 may generate activation data in step 1212 to the application service provider 1260.” *Id.*, 31:8-10. Figure 12 describes step 1212 as “Activate Service for Each [Telephone Number].” *Id.*, Fig. 12. “The activation response corresponding to the activation of the service may be returned from the application service provider 1260 in step 1214.” *Id.*, 31:19-22. The unified services platform may also “generate the necessary configuration data to activate the new service for each subscriber in the group plan.” *Id.*, 31:30-32. “In an embodiment, the unified service platform 1240 may notify the corresponding application service provider 1260 that the provider 1220 is activating the new service in place of the subscribers in the group plan.” *Id.*, 31:35-39. “As a result, the new service may be assigned to the enterprise and different rules may apply than if the subscribers were directly activating the new application by themselves.” *Id.* 31:39-42.

“subscription request for a service for a group plan” [1.1]–[1.2]

Houh Supplemental Declaration

group plan.” ’047 patent, 31:30-32. These disclosures do not disclose or suggest that subscribers of a group plan **also** become subscribers to the service. ’047 patent, 31:1-5, 31:30-32 (cited in POR 13). None of these passages address what happens after a service has been added to a group plan. On the contrary, Patent Owner’s references to the ’047 patent merely indicate that members of the group plan are given access to the service—which, I note, is consistent with the language claim of Limitation [1.7] (reciting “*providing access to the service for each telephone number*”).

“activation request,” “activation response,” “associating the service,” and “providing access to the service” [1.4]-[1.7]

1. A method of provisioning a service for use with a group plan, the method comprising:

receiving, by a unified services platform system, a subscription request for a service for a group plan, wherein the group plan comprises a plurality of telephone numbers, wherein each telephone number of the plurality of telephone numbers is associated with a subscriber, and wherein the service is provided by a third party application service provider system;

sending, by the unified services platform system, an activation request for the group plan to the third party application service provider system,

receiving an activation response from the third party application service provider system;

associating the service with each telephone number of the plurality of telephone numbers;

providing access to the service for each telephone number based on the associating;

FIG. 12 illustrates an embodiment of an activation process in which an enterprise administrator is responsible for activating a service for one or more subscribers. For the

The techniques for utilizing a third-party service after activating an account with the third-party provider may vary depending on the embodiment. For example, in an embodi-

“activation request,” “activation response,” “associating the service,” and “providing access to the service” [1.4]-[1.7]

Patent Owner Sur-Reply

In that vein, the “activation request for the group plan” recited in limitation [1.4] is a shorthand way of referring to the subscription requested for the group (i.e., each member of the group) in limitation [1.1]. No other interpretation makes

“the service” [1.10]

receiving, by the unified services platform system, a subscription request for a second service from a subscriber associated with a first telephone number of the plurality of telephone numbers, wherein the second service is provided by a second third party application service provider system;
sending, by the unified services platform system, a second activation request for the service to the second third party application service provider system;
receiving a second activation response from the second third party application service provider system;
associating the second service with the first telephone number; and
providing access to the second service for the first telephone number based on the associating.

Patent Owner Sur-Reply

recited in limitation [1.1]. Zilkr agrees with Cisco that “the service” in limitation [1.10] is the “second service” introduced in limitation [1.8]. Page 30 of Zilkr’s

Key Points

- Claim construction
- Raleigh renders obvious:
 - a “*subscription request for a service for a group plan*” [1.1]-[1.2]
 - an “*activation request,*” “*activation response,*” “*associating the service,*” and “*providing access to the service*” [1.4]-[1.7]
 - a “*second activation request*” and a “*second activation response*” [1.10]-[1.11]
 - the “*third party application communicates with the network provider system through the unified services platform system*” [5.2]

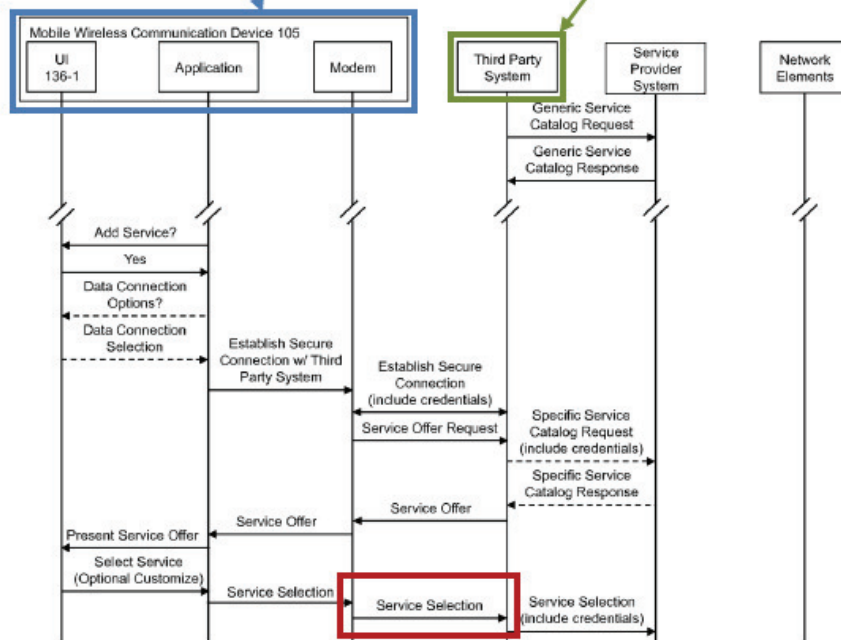
Raleigh's "subscription request for a service" [1.1]

Mobile wireless communication

device of a user

Third party service partner system

Raleigh



Raleigh, FIG.36A (partial annotated)

[1846] FIGS. 36A and 36B illustrate a representative process for selecting a service for a mobile wireless communication device 105. In some embodiments, selection of a ser-

offered. In some embodiments, the user selects a service plan through the UI 136-1, and the mobile wireless communication device 105 communicates the service plan selection to the third party service partner system. In some embodiments,

calls, etc.). Some examples of services that may be offered by a service provider include the non-mutually-exclusive categories of voice services (e.g., phone calls, etc.), messaging services (e.g., text messages, multimedia messages, etc.), data services (e.g., Internet access, etc.), and hybrid services (e.g., voice over IP (VOIP), video chat, etc.). A service pro-

Ex.1005, Fig. 36A, [1846], [1850], [0381]
(cited in Petition at 22-25, Ex.1003, ¶¶64, 68, 70, Reply at 16).

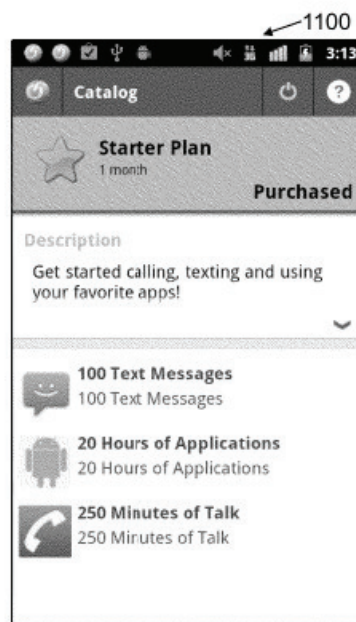
Raleigh's "service for a group plan" [1.1]

Service Plan Examples



Raleigh, FIG.3B (annotated)

Master User Manages Master Service Account

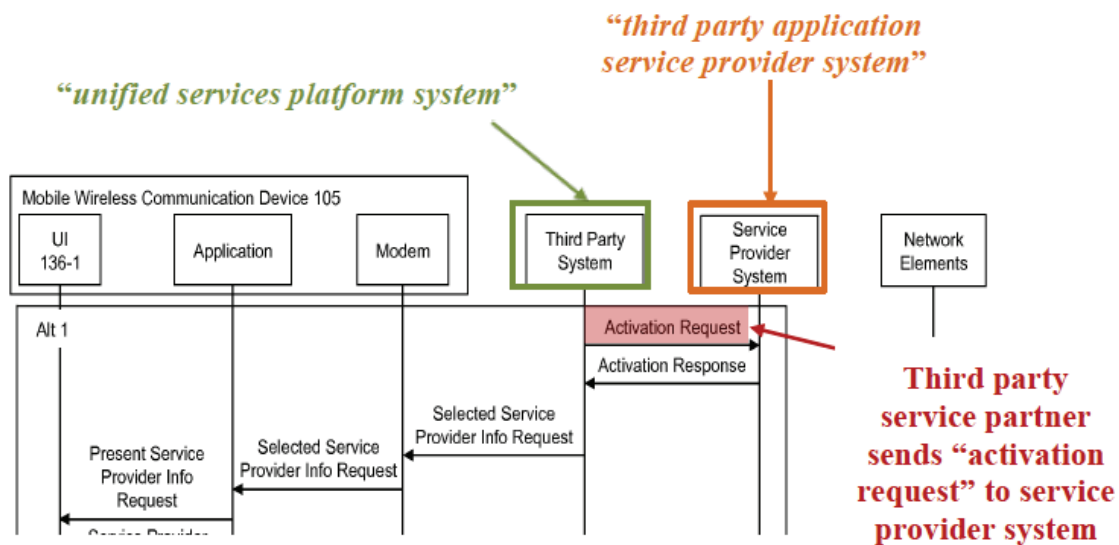


Raleigh, FIG.11A



Raleigh, FIG.11D

Raleigh's "activation request for the group plan" [1.4]



Raleigh, FIG.35A (partial annotated)

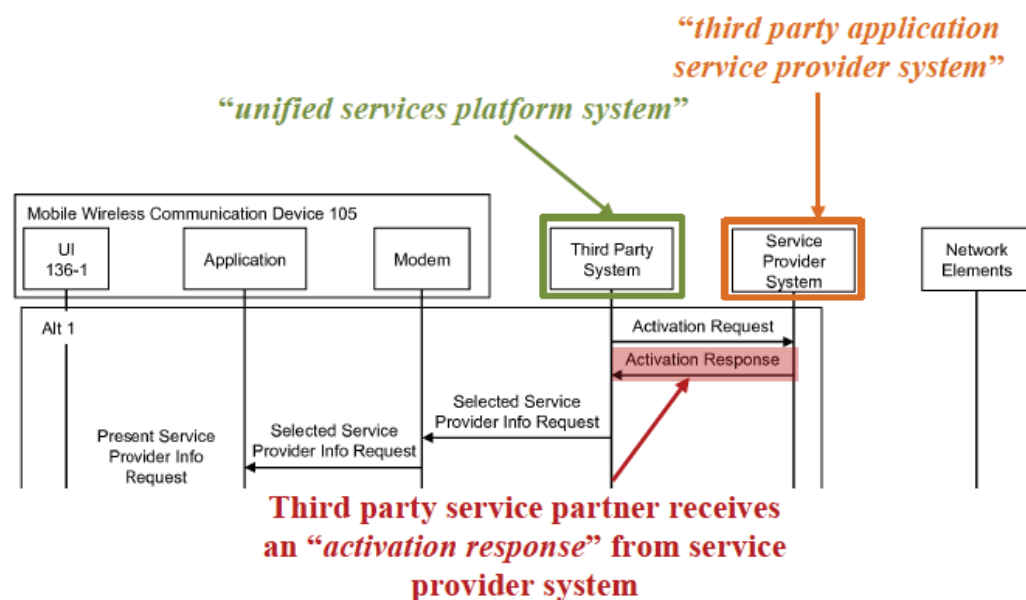
Raleigh

[1840] FIGS. 35A and 35B illustrate representative processes to activate an association between a service provider and the mobile wireless communication device 105, e.g., to establish a new service account or associate the mobile wireless communication device with an existing service account of the service provider. FIG. 35A illustrates a first alternative

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ments, the third party service partner system provides an activation request to the service provider system of the selected service provider. In some embodiments, the activa-

Raleigh's "activation response" [1.5]



Raleigh, FIG.35A (partial annotated)

Raleigh

[1840] FIGS. 35A and 35B illustrate representative processes to activate an association between a service provider and the mobile wireless communication device 105, e.g., to establish a new service account or associate the mobile wireless communication device with an existing service account of the service provider. FIG. 35A illustrates a first alternative

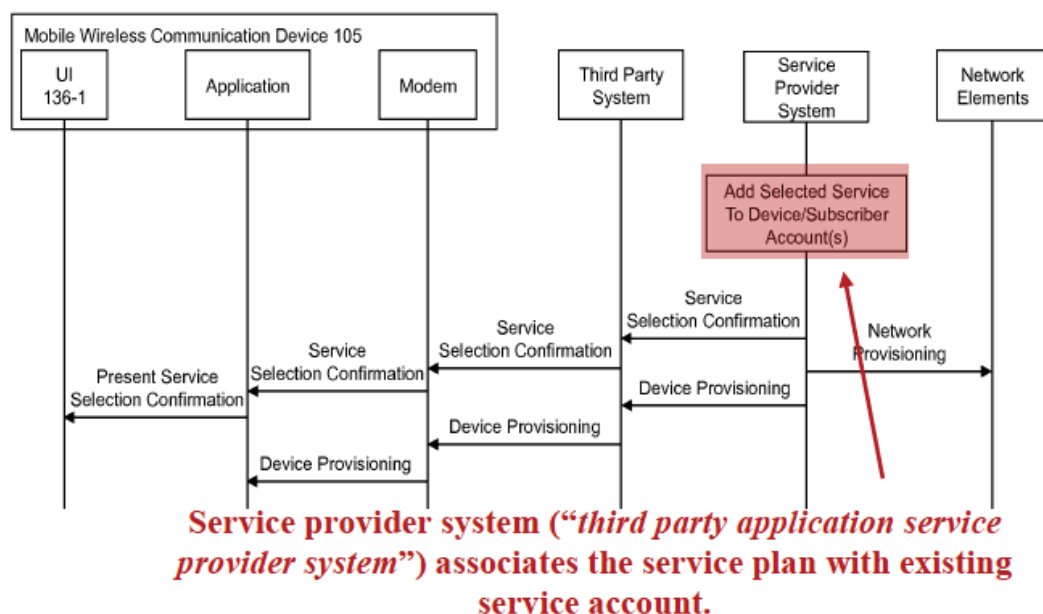
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embodiments, the service provider system provides an activation response message to the third party service partner system in response to the activation request message. In some

accounts. In some embodiments, the service provider system of the selected service provider communicates a message confirming activation of the new service account and the association of the mobile wireless communication device 105 therewith. In some embodiments, the service provide system

Ex.1005, Fig. 35A, [1840] (cited in Petition at 35, Ex.1003, ¶94);
Ex.1005, [1843] (cited in Reply at 16).

Raleigh's "associating the service" [1.6]



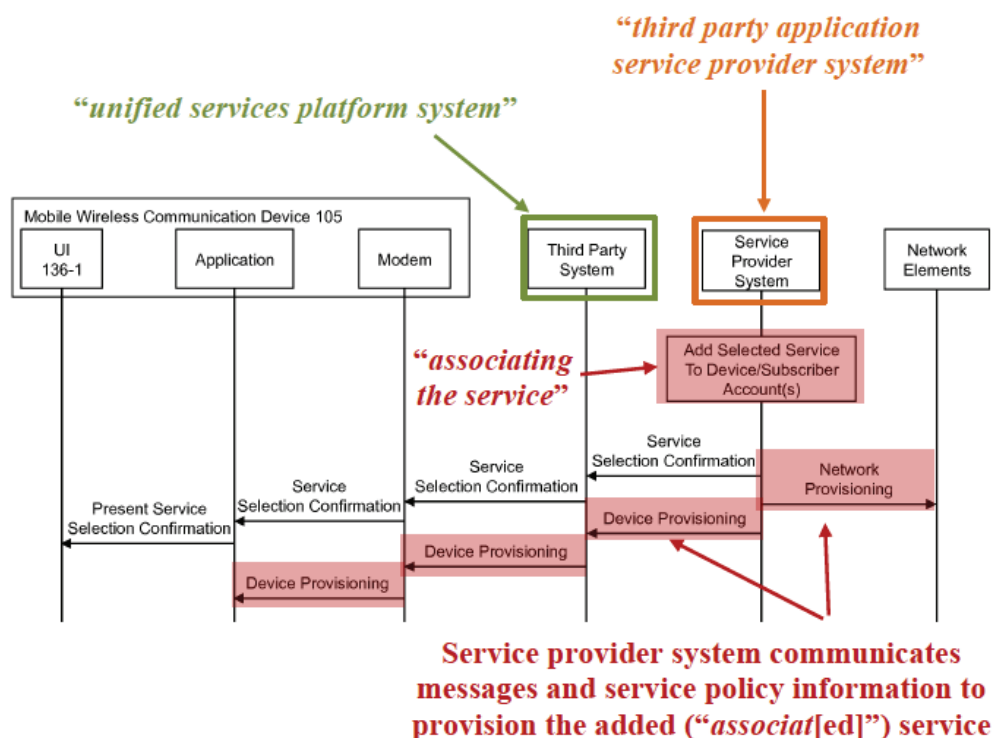
Raleigh, FIG.36B (partial annotated)

Raleigh

[1846] FIGS. 36A and 36B illustrate a representative process for selecting a service for a mobile wireless communication device 105. In some embodiments, selection of a ser-

[1852] In some embodiments, the service provider system adds (and/or customizes) one or more selected service plans to a service account associated with the mobile wireless communication device 105 and/or the user thereof. In some

Raleigh's "providing access to the service" [1.7]



Raleigh, FIG.36B (partial, annotated)

Raleigh

mobile wireless communication device 105. In some embodiments, the service provider system communicates messages to one or more network elements that provide for provisioning of the selected service plans. In some embodiments, pro-

* * *

and/or billing for the selected service plans. In some embodiments, service policy information is also communicated by the service provider system through the third party service partner system to the mobile wireless communication device 105 to provision the mobile wireless communication device 105 for the selected service plans.

In some embodiments, device provisioning includes providing information to configure the mobile wireless communication device 105 to use one or more services of the service provider, e.g., "free", "sponsored", or "trial" services provided at no cost to the user of the mobile wireless communication device 105.

Raleigh's Integrated Process

Raleigh

[1846] FIGS. 36A and 36B illustrate a representative process for selecting a service for a mobile wireless communication device 105. In some embodiments, selection of a ser-

cation device 105. In some embodiments, selection of a service is conducted in conjunction with selection of a service provider as described above. In some embodiments, selection

[0370] FIG. 35A illustrates a representative process to associate a mobile wireless communication device with a service account for a service provider in accordance with some embodiments.

Raleigh's Integrated Process

Houh Declaration

51. Raleigh's disclosure provides a cohesive system to facilitate each of the aspects listed above. *See* Raleigh, Abstract; *see also* Raleigh, [0057]. For instance, Raleigh's Abstract and Summary describe these aspects together, with each aspects being an integral part of a comprehensive architecture for selecting, sharing (e.g., in a master service account), designing, promoting, and managing services. Raleigh, Abstract, [0053]-[0057]. In this way, Raleigh's description itself

54. A POSITA would have therefore been motivated to combine the service selection processes with Raleigh's teachings for APIs and managing service plans for master service accounts, because Raleigh's own disclosure suggests the combination. Additionally, a POSITA would have had a reasonable expectation of success in the combination because the combination would have been within the skill level of a POSITA. For instance, a POSITA would have been

Petitioner Reply

In this way, Raleigh's activation request is part of a comprehensive process for selecting and activating a service with a chosen service provider. *See* Ex.1003, ¶54; Pet. 18, 19. Raleigh's activation request, which is sent in order to "establish a

'047 Patent Sharing Services with a Group

Petitioner's Reply

this argument. The '047 patent contemplates services that would be shared, such as in a corporate context where an administrator establishes a single service for multiple corporate users. Ex.1001, 30:29-31 ("the enterprise administrator may be responsible for establishing a service for one or more subscribers."), 31:39-40 ("the new service may be assigned to the enterprise"). The '047 patent also contemplates one group member having a master account with control over other group members' access. Ex.1001, 31:43-49 ("allow the enterprise (e.g., through an enterprise administrator) to directly control and manage the account for the subscriber"), 30:29-40 ("the group administrator may be a member of the group").

'047 patent

of conducting business for the company. In this case, the enterprise administrator may be responsible for establishing a service for one or more subscribers. The service may also

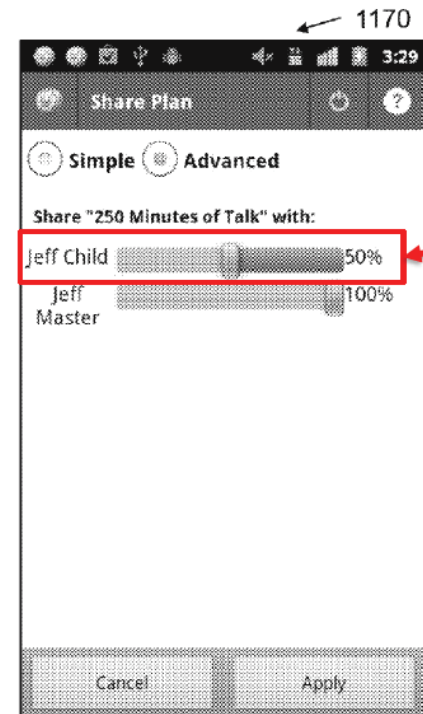
subscribers in the group plan. As a result, the new service may be assigned to the enterprise and different rules may apply than if the subscribers were directly activating the new application by themselves. In an embodiment, the corre-

Raleigh Allocates Discrete Portions of a Service Plan

[0806] Rather than simply sharing a service plan among multiple mobile wireless communication devices, which may not prevent “hogging” of the allocation provided by the service plan by individual devices, it may be desirable to allocate discrete portions of a service plan to different mobile wireless communication devices within the device group. For

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service plan allocation. In FIG. 11G, however, the subscriber has enabled the child device to use up to fifty percent of the “250 Minutes of Talk” service plan allocation. The master device is still allowed to use up to all of the “250 Minutes of Talk” service plan allocation, however. Thus, the master device may still “hog” the service plan’s allocation, but the subscriber has ensured that the child device cannot use more than half of the service plan’s allocation.

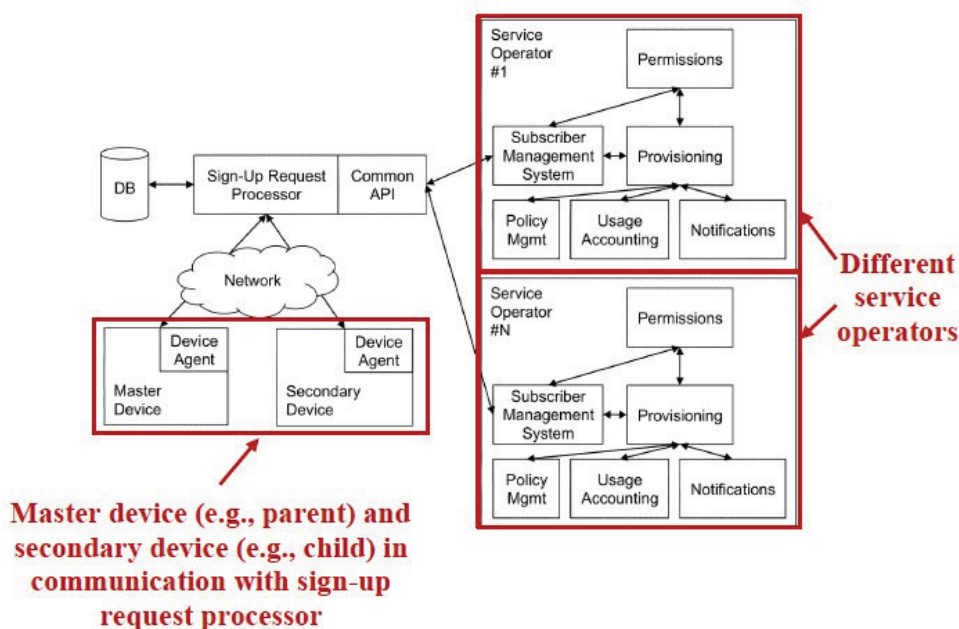


“Child” account limited to using half of available minutes

FIG. 11G

Raleigh Provides Services from Multiple Service Providers [1.9]

Raleigh



Raleigh, FIG.15I (annotated)

Raleigh

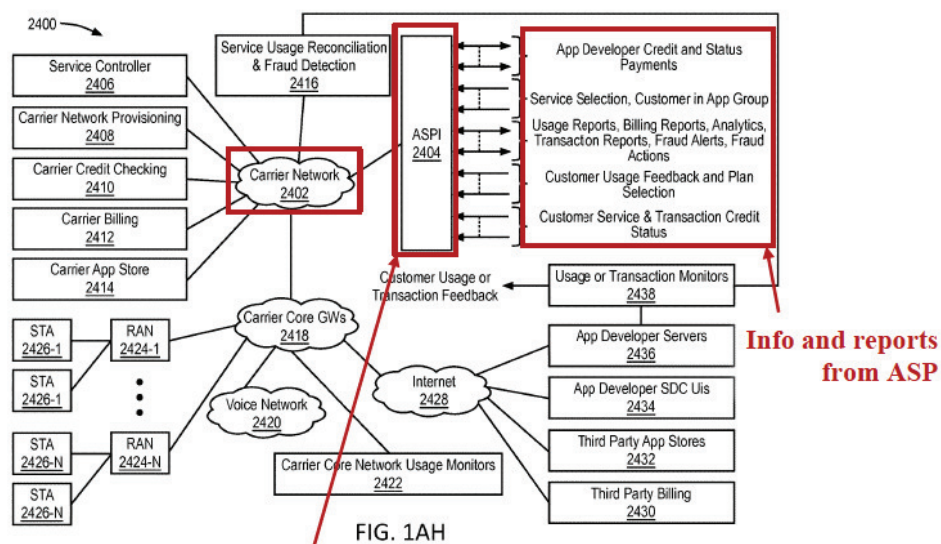
calls, etc.). Some examples of services that may be offered by a service provider include the non-mutually-exclusive categories of voice services (e.g., phone calls, etc.), messaging services (e.g., text messages, multimedia messages, etc.), data services (e.g., Internet access, etc.), and hybrid services (e.g., voice over IP (VOIP), video chat, etc.). A service pro-

Houh Declaration

account. For example, the “service” introduced at [1.1] may be a “messaging service” or a “data service,” and the “second service” introduced here at [1.8] may be a VOIP service. Raleigh, [0381].

Raleigh's ASPI implemented by “unified services platform system” [5.2]

Raleigh



ASPI (“unified services platform system”) as an intermediary between ASPs and carrier network (“network provider system”)

Raleigh, FIG.1AH (annotated)

Houh Declaration

151. Raleigh teaches that the ASPI may be a third party system that distributes “carrier access services ... to application service providers.” Raleigh, [1605]. It would have been obvious for the ASPI engine 2904 to be implemented by the third party service partner system (“unified services platform system”) to operate as the intermediary between the application service providers and the carrier (“network provider system”). Further, it would have been obvious to a POSITA for the APSs to communicate with the carrier network (“network provider system”) through the ASPI (“unified services platform system”). APSs may communicate “Credit and Status” information, “Usage Reports, Billing Reports, Analytics, Transaction Reports, Fraud Alerts,” etc. Raleigh, FIG.1AH.



The bridge to possible