

UNITED STATES PATENT AND TRADEMARK OFFICE

PATENT TRIAL AND APPEAL BOARD

MOTOROLA SOLUTIONS, INC.,
Petitioner,

v.

STA GROUP LLC,
Patent Owner.

Case IPR2023-01294
U.S. Patent No. 8,831,664

**PATENT OWNER'S RESPONSE TO PETITIONER'S IDENTIFICATION
OF NEW SUR-REPLY ARGUMENTS**

TABLE OF PATENT OWNER’S EXHIBITS

Exhibit No.	Exhibit Name
2001	Shaffer et al. (WO2007/021586) (“Shaffer”)
2002	Biltz et al. (US 2008/0037461) (“Biltz”)
2003	December 2023 DocketNavigator Time to Trial Statistics in Patent Cases in the United States District Court for the Eastern District of Texas
2004	<i>STA Group LLC v. Motorola Solutions, Inc.</i> , Case No. 2:22-cv-00381 (E.D. Tex.), Dkt No. 360
2005	Declaration of Shmuel Shaffer, Ph.D.
2006	Deposition Transcript of David Williams, Ph.D. dated June 12, 2024
2007	Resume of Shmuel Shaffer, Ph.D.

Per's the Board's Order (Paper 32), Patent Owner submits this response to Petitioner's identification of new arguments (Paper 33) in the Sur-Reply (Paper 30).

I. Ground 1: Downs-EDACS

The fact that EDACS does not disclose monitoring media streams associated with channels in a communication environment is not a new argument. The Patent Owner Response extensively focused on the lack of the claimed “media streams” in EDACS. Paper 19, 25-33. Indeed, the focus of the Patent Owner Response centered on the fact that EDACS describes what “occurs *before* the media stream is created on a working channel.” Paper 19, 32. Thus, Patent Owner argued that there is no claimed media stream that is monitored, as EDACS only describes what occurs before any media stream exists. Nevertheless, the Sur-Reply is responsive to Petitioner's Reply, which provides a newly introduced and tortured read of the Court's claim construction of “media stream” to argue that the “construction does not require that audio be sent before associated data.” Paper 26, 1, 6. The Reply uses this construction to argue that the control and working channels of EDACS could be combined to receive an alert and then later communicate associated audio. Paper 26, 2. Petitioner's Reply concludes that EDACS discloses the claimed “media stream” through the transmission of data in one channel and audio and/or video in another channel. Paper 26, 2, 5.

Patent Owner rebutted Petitioner's incorrect application of the claim construction and clarified that even if the control and working channels are combined, EDACS still does not disclose the claimed media streams, much less media streams that are monitored. Paper 30, 8. The argument about the monitoring step merely highlights the tenuous nature of Petitioner's new claim interpretation. Specifically, the Sur-Reply reiterated the Patent Owner's Response in that the Challenged Claims require that the monitoring of audio and/or video must begin before an alert is received in the media stream. Paper 30, 7; *see also* Paper 19, 10.

II. Ground 7: Kim

Patent Owner's claim differentiation argument is permissibly responsive to Petitioner pointing to an embodiment from the '664 Patent where a management center makes an adjustment to a media stream that is processed internally. Paper 26, 21. The embodiment cited by Petitioner corresponds to independent Claims 11 and 16, which could include the management center making an internal adjustment to how a media stream is processed. Petitioner ignored other embodiments from the '664 Patent and the plain language of Claim 1, which recites that "an adjustment is made to how the media stream is provisioned to an endpoint in the communication environment." Ex. 1001, Claim 1. The claim differentiation argument was accordingly necessary to address arguments from Petitioner's Reply.

Dated: December 6, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2024, a true and correct copy of the foregoing was caused to be served electronically on the following counsel of record for Petitioner at the following email addresses:

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