

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC., AMAZON.COM SERVICES LLC,
Petitioners,

v.

NOKIA TECHNOLOGIES OY,
Patent Owner.

IPR2024-00921

U.S. Patent No. 8,077,991

**IDENTIFICATION OF GROUNDS AND
ARGUMENTS IN THE PETITION**

Petitioners file this paper, as directed by the Board’s January 7, 2025 e-mail (Ex-3001), to identify the pages of argument for each challenged claim and the corresponding grounds.

I. IDENTIFICATION OF CHALLENGE

The following corrected table identifies the challenged claims and grounds.

Corrected Table:

Ground	Claims	Statutory Basis	Prior Art
1	1, 5-6, 8-13, 17, 18, 20, 21	§103	Koga
2	2-3, 7-9, 12-15, 17-21, 39	§103	Koga and Lin
3	8, 9, 20, 21	§103	Koga and Narroschke
4	8, 9, 20, 21	§103	Koga, Lin, and Narroschke

Previous Table (as Filed in the Petition):

Ground	Claims	Statutory Basis	Prior Art
1	1, 5-6, 8-13, 17-21	§103	Koga
2	1-3, 5-15, 17-21, 39	§103	Koga and Lin
3	1, 5-6, 8-13, 17-21	§103	Koga and Narroschke
4	1-3, 5-15, 17-21, 39	§103	Koga, Lin, and Narroschke

II. IDENTIFICATION OF ARGUMENTS IN THE PETITION

The following tables identify, for each challenged claim, the ground(s) on which each claim is being challenged and the pages of the Petition where the arguments can be found. The page ranges identified includes all dependencies, as ordered by the Board.

A. Ground 1 (Koga): Independent Claim 1 and Its Dependent Claims 5, 6, and 8-12

Claim	Dependencies	Arguments in the Petition
1	Independent	pp. 31-46
5	1	pp. 59-60; and Koga claim 1 (pp. 31-46)
6	1	p. 60; and Koga claim 1 (pp. 31-46)
8	1	pp. 70-74; and Koga claim 1 (pp. 31-46)
9	1	pp. 79-81; and Koga claim 1 (pp. 31-46)
10	1	pp. 62-63; and Koga claim 1 (pp. 31-46)
11	1	p. 63; and Koga claim 1 (pp. 31-46)
12	1	pp. 63-64; and Koga claim 1 (pp. 31-46)

B. Ground 1 (Koga): Independent Claim 13 and Its Dependent Claims 17, 18, 20, and 21

Claim	Dependencies	Arguments in the Petition
13	Independent	pp. 46-47; and Koga claim 1 (pp. 31-46)
17	13	pp. 59-60; and Koga claim 13 (pp. 46-47) and claim 1 (pp. 31-46)
18	13	p. 60; and Koga claim 13 (pp. 46-47) and claim 1 (pp. 31-46)
20	13	pp. 70-74; and Koga claim 13 (pp. 46-47) and claim 1 (pp. 31-46)
21	13	pp. 79-81; and Koga claim 13 (pp. 46-47) and claim 1 (pp. 31-46)

C. Ground 2 (Koga+Lin): Dependent Claims 2, 3, 7-9, and 12

Claim	Dependencies	Arguments in the Petition
2	1	pp. 53-57; and Koga claim 1 (pp. 31-46)
3	2, 1	pp. 57-58; Koga+Lin claim 2 (pp. 53-57); and Koga claim 1 (pp. 31-46)
7	2, 1	pp. 61-62; Koga+Lin claim 2 (pp. 53-57); and Koga claim 1 (pp. 31-46)
8	1	pp. 70-74; and Koga claim 1 (pp. 31-46)
9	1	pp. 79-81; and Koga claim 1 (pp. 31-46)
12	1	pp. 63-66; and Koga claim 1 (pp. 31-46)

D. Ground 2 (Koga+Lin): Independent Claim 13 and Its Dependent Claims 14, 15, and 17-21

Claim	Dependencies	Arguments in the Petition
13	Independent	pp. 46-53; and Koga claim 1 (pp. 31-46)
14	13	pp. 53-57; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)
15	14, 13	pp. 57-58; Koga+Lin claim 14 (pp. 53-57) and claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)
17	13	p. 59; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)
18	13	p. 60; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)

Claim	Dependencies	Arguments in the Petition
19	13 ¹	pp. 66, 61-62; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)
20	13	pp. 70-74; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)
21	13	pp. 79-81; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)

E. Ground 2 (Koga+Lin): Independent Claim 39

Claim	Dependencies	Arguments in the Petition
39	Independent	pp. 66-69; Koga+Lin claim 3 (pp. 57-58), claim 2 (pp. 53-57), and claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)

F. Ground 3 (Koga+Narroschke): Claims 8, 9, 20, and 21

Claim	Dependencies	Arguments in the Petition
8	1	pp. 70-79; and Koga claim 1 (pp. 31-46)
9	1	pp. 79-81; and Koga claim 1 (pp. 31-46)
20	13	pp. 70-79; and Koga claim 13 (pp. 46-47) and claim 1 (pp. 31-46)
21	13	pp. 79-81; and Koga claim 13 (pp. 46-47) and claim 1 (pp. 31-46)

¹ The Petition argues claim 19 should depend from claim 14. *See* Pet. 30. In that case, the Koga+Lin argument for claim 14 (pp. 53-57) also applies for claim 19.

G. Ground 4 (Koga+Lin+Narroschke): Claims 8, 9, 20, and 21

Claim	Dependencies	Arguments in the Petition
8	1	pp. 70-79; Koga claim 1 (pp. 31-46); and Koga+Lin claims 1 & 13 (pp. 46-53)
9	1	pp. 79-81; Koga claim 1 (pp. 31-46); and Koga+Lin claims 1 & 13 (pp. 46-53)
20	13	pp. 70-79; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)
21	13	pp. 79-81; Koga+Lin claim 13 (pp. 46-53); and Koga claim 1 (pp. 31-46)

Date: January 13, 2025

Respectfully submitted,

SHEPPARD, MULLIN,
RICHTER & HAMPTON LLP

/Harper Batts/

Harper Batts (Reg. No. 56,160)
Attorneys for Petitioners

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing document was served via email to all parties to this proceeding at the addresses indicated:

Counsel for Patent Owner:

Scott W. Hejny (shejny@mckoolsmith.com)
Eric S. Hansen (ehansen@mckoolsmith.com)
Samuel Moore (smoore@mckoolsmith.com)
Mitch Verboncoeur (mverboncoer@mckoolsmith.com)
Nokia_IPRs_Amazon_HP@mckoolsmith.com

Date: January 13, 2025

/Harper Batts/
Harper Batts (Reg. No. 56,160)
Attorney for Petitioners