

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Good Technology Software, Inc.  
Petitioner

v.

MobileIron, Inc.  
Patent Owner

Patent No. 8,340,633

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*Inter Partes* Review No. IPR 2015-00833

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**PATENT OWNER'S PRELIMINARY RESPONSE  
PURSUANT TO 37 C.F.R. § 42.107**

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## **I. Introduction**

The Board should not institute *inter partes* review (IPR) on claims 1-4, 6-25, 27, and 28 of U.S. Patent No. 8,340,633 (“the ’633 Patent”) because petitioner, Good Technology Software, Inc., (“Petitioner” or “GTSI”), has not shown a reasonable likelihood of prevailing on any of its proposed grounds of unpatentability. Petitioner has failed to show how the proposed Cassett-Stevens combination allegedly discloses each and every element of independent claims 1 and 28, effectively ignoring the clear text of the claim limitations. Petitioner has also failed to adequately explain the proposed combination, and failed to show that a person of ordinary skill in the art would have combined Cassett and Stevens to arrive at the inventions recited in the claims of the ’633 Patent. Indeed, as explained below, the combination of references proposed by Petitioner would change the basic principles under which the references were designed to operate.

## **II. Overview of the ’633 Patent**

As business enterprises increasingly began to rely on mobile and handheld devices to perform a number of business-related functions, the inventors of the ’633 Patent recognized that those mobile devices would have access to data that would be helpful to the enterprise’s managers. As explained in the ’633 Patent, by collecting mobile device data:

“a manager of the enterprise may then gain valuable insight into the mobile usage activities of all or a portion of the users of the entire

enterprise, as well as the [Quality of Service] experienced by the users. The manager may then exploit this aggregated data to better manage the enterprise's mobile devices, control costs, and monitor Quality of Service. In various embodiments, this may include negotiating with wireless network providers for better rates, policing QoS commitments or claims, optimizing wireless service plans down to individual mobile device granularity, and providing feedback or instruction to mobile users within the enterprise, among other managing goals.”

(Ex. 1001, ('633 Patent) at 18:13-27.)

The '633 Patent explains the importance of collecting device-usage data from the mobile devices themselves, rather than relying on the network carrier/service provider for this data. As the patent explains:

“A primary and significant difference between embodiments of the present disclosure and conventional mobile management services is that the data collected and used . . . is received directly from the mobile devices (e.g., phones, personal digital assistants (PDAs)) . . . rather than from a network carrier or service provider (e.g., AT&T, Verizon, T-mobile, etc.). This is in contrast to conventional mobile device management service providers such as, for example, Telecom Expense Management (TEM) providers, which acquire data from the network service providers themselves.”

(*Id.* at 18:65-19:9.) Indeed, as the '633 Patent explains, the use of network-supplied data would be insufficient to achieve the advantages of the invention,

noting:

“Such data and reports provided by conventional mobile device management service providers are obviously limited in their usefulness. By way of example, a given enterprise may hope to negotiate with its network service provider for a better rate based on the reports. However, the enterprise’s negotiating leverage is severely limited since the limited data used to generate the reports was provided by the network service provider itself.”

(*Id.* at 19:31-38.)

In view of these shortcomings in prior art systems, the ’633 Patent discloses, for example, “a method [ ] that includes receiving mobile device usage data directly from a plurality of mobile devices associated with a particular enterprise,” aggregating this data at a central database and “generating one or more mobile device usage reports based on the aggregated data. (*Id.* at Abstract.)

As explained in the ’633 Patent, a mobile device management application may interact with a control client application on a mobile device. (*Id.* at 2:41-45.) The control client, in turn, “logs man-machine interface (MMI) data, file system commands, and other data characterizing usage of, and/or the actions performed on, the mobile device. (*Id.* at 2:47-50.) Fig. 1A illustrates the interaction between a mobile device and a device management server over a variety of communication channels:

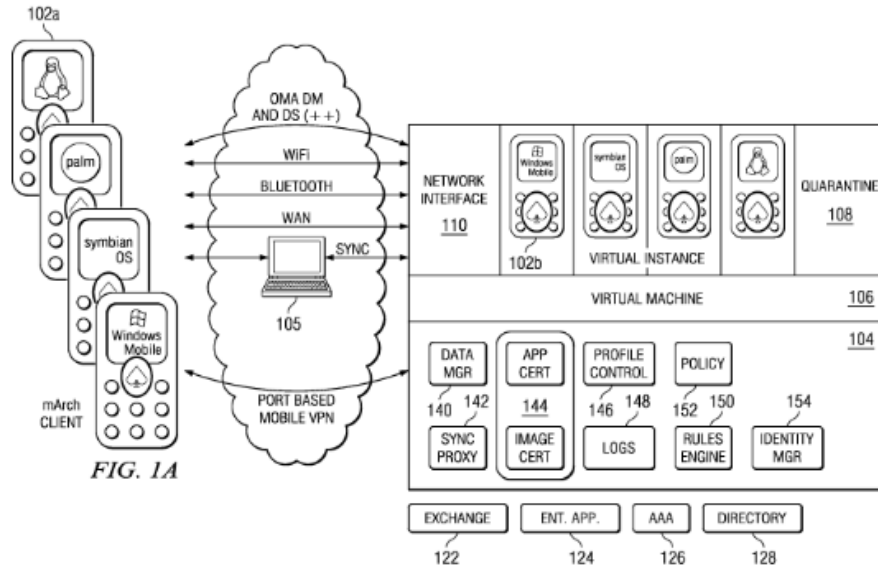
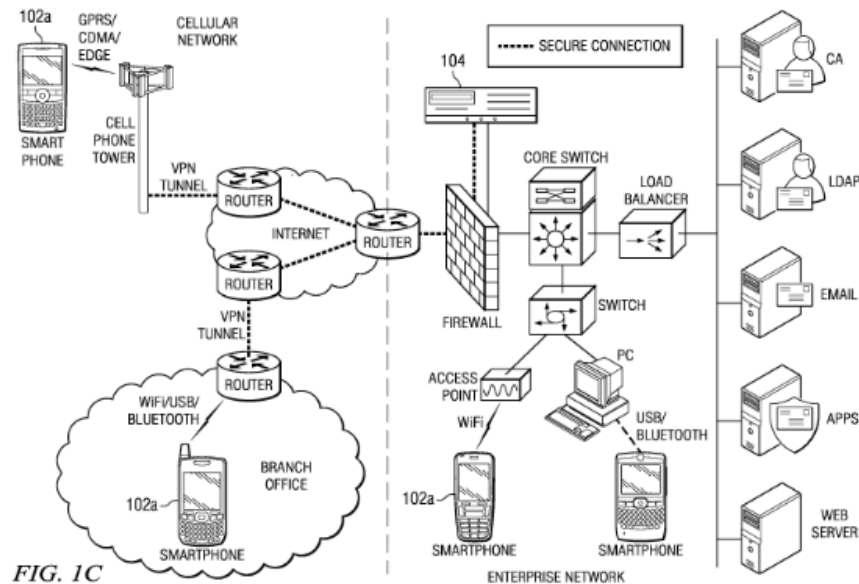


Fig. 1C illustrates an alternative example architecture.



Claim 1 is exemplary of the claims challenged in the Petition:

1. A method, comprising:
  - receiving, at a first server, mobile device network traffic usage data directly from each of a plurality of mobile devices



associated with a particular enterprise, a first subset of the plurality of mobile devices being associated with a first network service provider and a second subset of the plurality of mobile devices being associated with a second network service provider;

aggregating the usage data from each of the plurality of mobile devices according to characterized actions performed on each of the mobile devices; and

generating based on the aggregated usage data one or more mobile device usage reports at least a subset of which compare a first aggregated usage data associated with the first network service provider with a corresponding second aggregated usage data associated with the second network service provider.

(*Id.* at 27:2-17.)

### **III. Claim Construction**

As will be described below, Petitioner has failed to demonstrate a reasonable likelihood that any of the challenged claims are unpatentable, even if the Board adopts Petitioner's constructions. MobileIron however, provides the following responses to Petitioner's proposed constructions. MobileIron reserves the right to offer constructions for additional terms, should those terms become relevant to either this or other proceedings. MobileIron also reserves the right to offer claim constructions in other proceedings, including district court litigation, that differ from those presented in this Preliminary Response. *See Gordon \* Howard Assocs.*,

*Inc. v. LunarEye, Inc.*, Case IPR2014-00712, Paper No. 8, at \*7 (P.T.A.B. Oct. 17, 2014) (“The standard of claim construction in a district court infringement action is different than the standard applied by the Board.”) (citing *In re Morris*, 127 F.3d 1048, 1053-54 (Fed. Cir. 1997)).

#### **A. Legal Standard For Claim Construction**

“In an inter partes review, claim terms in an unexpired patent are interpreted according to their broadest reasonable construction in light of the specification of the patent in which they appear.” *Dominion Dealer Solutions, LLC v. AutoAlert, Inc.*, Case IPR2013-00220 (JL), Paper 8, at \*8 (P.T.A.B. Aug. 15, 2013) (citing 37 C.F.R. § 42.100(b)). Furthermore, claim language “must be read in accordance with the precepts of English grammar.” *Nissam Corp. v. Time Warner, Inc.*, Appeal No. 2011-011260, at \*2 (B.P.A.I. Feb. 6, 2012) (quoting *In re Hyatt*, 708 F.2d 712, 714 (Fed. Cir. 1983)).

Expert testimony that merely offers a construction, cites to sections of the disclosure, and states that a person of ordinary skill in the art would adopt the offered construction based on those sections of the disclosure, is entitled to little to no weight. *See Toyota Motor Corp. v. Hagenbuch*, Case IPR2013-00638, Paper 10, at \*11 (P.T.A.B. Mar. 25, 2014) (“Although we take [the expert’s] opinion into consideration, we find it lacking in detail.”). “Merely repeating an argument from the Petition in the declaration of a proposed expert does not give that argument

enhanced probative value.” *Kinetic Techs., Inc. v. Skyworks Solutions, Inc.*, Case IPR2014-00530, Paper 8, at \*13 (P.T.A.B. Sept. 29, 2014). Further, ““extrinsic evidence may be used only to assist in the proper understanding of the disputed limitation; it may not be used to vary, contradict, expand, or limit the claim language from how it is defined, even by implication, in the specification or file history.”” *CBS Interactive Inc. v. Helferich Patent Licensing, LLC*, Case No. IPR2013-00033, Paper 122, at \*14 (P.T.A.B. Mar. 3, 2014) (quoting *Bell Atl. Network Servs. v. Covad Commc ’ns Grp.*, 262 F.3d 1258, 1269 (Fed. Cir. 2001)).

**B. “mobile device network traffic usage data”**

<b>Term</b>	<b>MobileIron’s Construction</b>	<b>Petitioner’s Construction</b>
“mobile device network traffic usage data”	“data collected from a mobile device relating to its use of a network”	“information regarding use of a network for sending and/or receiving data by a mobile device.”

The Board should reject Petitioner’s proposed construction because it ignores the express claim language and is flatly inconsistent with the specification. Petitioner’s construction is therefore inconsistent with the broadest reasonable interpretation of this term.

The claim language is explicit that the usage data is received “*directly from*” the mobile device. Thus, *the words “mobile device” in this term are meant to reflect the source of the data*, not the type of data at issue -- as Petitioner’s construction incorrectly suggests.

Petitioner's construction ignores the repeated explanations in the '633 specification, which make clear that the '633 patent is concerned with data obtained directly from the phone, not from telephone carriers/service providers. For example, the '633 Patent explains:

*“A primary and significant difference between embodiments of the present disclosure and conventional mobile management services is that the data collected and used in particular embodiments of the present disclosure is received directly from the mobile devices . . . rather than from a network carrier or service provider.”*

(Ex. 1001, '633 Patent, 18:65- 19:5 (emphasis supplied).) This is consistent with one of the disclosed purposes of the techniques in the '633 Patent, which is to allow “a given enterprise...to negotiate with its service provider for a better rate based on the reports.” (*Id.* at 19:33-35.) The '633 patent further explains that the enterprise's “negotiating leverage is severely limited” when relying on data “provided by the network service provider itself.” (*Id.* at 19:35-38.) Thus, the '633 Patent discloses how to “solve most or all of the problems associated with conventional mobile device management service providers” by “receiv[ing] any and all data directly from the mobile phones associated with a given enterprise...to have a better information balance between what the enterprise knows and what its network service provider(s) know.” (*Id.* at 19:57-66.) The '633 Patent specification summarizes the importance of the source of the data: “*The present*

*inventors have determined that this ability to collect raw data directly from a mobile (or wireless) device, such as a mobile phone or smart phone...affords valuable insight.” (Id. at 17:64-18:1.)*

Accordingly, the claim text and specification confirm that the data referred to in this claim term must include data collected from mobile devices. Petitioner’s construction ignores this key feature of the ’633 Patent, and should therefore be rejected. The Board should adopt MobileIron’s proposed construction, as it most closely aligns with the claim language and description in the specification.

**C. “characterized actions performed on each of the mobile devices”**

<b>Term</b>	<b>MobileIron’s Construction</b>	<b>Petitioner’s Construction</b>
“characterized actions performed on each of the mobile devices”	Plain and ordinary meaning.	“identifiable usage of and/or actions performed on a mobile device”

The Board should afford the term “characterized actions performed on each of the mobile devices” its plain and ordinary meaning. Petitioner’s construction should be rejected as it (1) excludes certain preferred embodiments described in the specification and (2) improperly substitutes the claim term “characterized” with the clause “identifiable usage of and/or”.

The ’633 Patent expressly states that “dropped calls” are one of a variety of items that the system can report. (*See, e.g.*, Ex. 1001, ’633 Patent at 18:2-12 (“In particular, such data may include, by way of example, call information (e.g.,

calling party and location, receiving party and location, roaming information...and whether the call was dropped.)).) However, Petitioner does not explain how a dropped call could be considered either an “identifiable usage of” or an “action performed on” a mobile device. Thus, Petitioner’s construction appears to be unduly narrow as it would read out of the claim this preferred embodiment.

Second, Petitioner’s construction is improper as it merely substitutes “identifiable usage of and/or” for the word “characterized” in the claim term. (Pet. at 9.) Petitioner relies on one sentence from the specification, *i.e.*, “the control client logs man-machine interface (MMI) data, file system commands, and other data characterizing usage of, and/or the actions performed on, the mobile device.” (Ex. 1001, ’633 Patent at 2:47-50.) This sentence, however, describes some preferred data that might be logged. That sentence does not support Petitioner’s implicit argument that the term “characterized” is interchangeable with the phrase “identifiable usage of an/or”.

Accordingly, the Board should reject Petitioner’s proposed construction and afford this term its plain and ordinary meaning.

#### **IV. Petitioner Has Failed to Demonstrate a Reasonable Likelihood That Any of the Challenged Claims Are Unpatentable**

Petitioner has failed to demonstrate that Cassett and Stevens are properly combinable. Petitioner fails to demonstrate any suggestion or motivation to combine these references. And, even assuming *arguendo*, that Cassett and Stevens

were combinable, as Petitioner suggests, Petitioner fails to demonstrate that the combination would render the challenged claims unpatentable. Accordingly, the Board should deny the petition.<sup>1</sup>

#### **A. Legal Standard**

Obviousness requires that “each and every limitation of the claim is described or suggested by the prior art or would have been obvious based on the knowledge of those of ordinary skill in the art.” *Ex Parte Hindle*, Appeal 2012-003332, at \*8 (P.T.A.B. 2014) (citing *In re Fine*, 837 F.2d 1071, 1074 (Fed. Cir. 1988)). A patent claim is obvious under 35 U.S.C. § 103(a) only “if the differences between the claimed subject matter and the prior art are such that the subject matter as a whole would have been obvious at the time of the invention was made to a person having ordinary skill in the art to which said subject matter pertains.” *Dominion Dealer*, Case IPR2013-00220 (JL), Paper 8, at \*20 (citing *KSR Int’l Co. v. Teleflex Inc.*, 550 U.S. 398, 406 (2007)). “The analysis under 35 U.S.C. § 103(a) is objective and includes a determination of ‘the scope and content

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<sup>1</sup> This Preliminary Response identifies only a limited number of deficiencies in the Petition and the cited art. MobileIron reserves the right to identify additional deficiencies in both the Petition and the prior art at future relevant times in this proceeding and in other proceedings. Additionally, for the purposes of this Preliminary Response, MobileIron analyzes claims in particular groups. MobileIron reserves the right to analyze the claims separately or in different groups at future relevant times in this proceeding and in other proceedings.

of the prior art,’ the ‘differences between the prior art and the claims at issue,’ and ‘the level of ordinary skill in the pertinent art.’” *TRW Auto. US LLC v. Manga Elecs. Inc.*, Case IPR2014-00259, Paper 19, at \*10 (P.T.A.B. June 26, 2014) (quoting *KSR Int’l Co.*, 550 U.S. at 406). “[R]ejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness.” *Id.* at \*10-11 (quoting *KSR Int’l Co.*, 550 U.S. at 418).

A showing of obviousness requires “an articulated reason with a rational underpinning to combine specific teachings in the references in a particular manner to arrive at the claimed invention[.]” *Dominion Dealer*, Case IPR2013-00223 (JL), Paper 9, at \*19 (P.T.A.B. 15 Aug. 2013) (citing *KSR Int’l Co.*, 550 U.S. at 418). Arguing that references are analogous to the invention of the patent at issue or to each other is insufficient. *Id.* Petitioner must offer “a sufficient explanation of how the references may be combined, from the perspective of one with ordinary skill in the art, to arrive at the claimed invention, and why the proffered combination accounts for all the features of each claim.” *Id.* Merely restating claim language as an alleged motivation to combine presents a circular rationale that “fails to provide a sufficient reason as to why one of ordinary skill in the art would have been prompted to combine the teachings of the references[.]” *TRW Auto. US LLC*, Case IPR2014-00259, Paper 19, at \*14. “The existence of common



elements found in both the challenged claims and the [relied upon references] does not establish that the challenged claims would have been obvious.” *Kinetic Techs., Inc.*, IPR2014-00529, Paper 8, at \*15. Petitioner must “explain why a person of ordinary skill in the art would have combined elements from specific references in the way the claimed invention does.” *Id.* (citing *ActiveVideo Networks v. Verizon Commc’ns, Inc.*, 694 F.3d 1312, 1328 (Fed. Cir. 2012)).

Moreover, it is well established that combinations that change the “basic principles under which the [prior art] was designed to operate,” *In re Ratti*, 270 F.2d 810, 813 (CCPA 1959), or that render the prior art “inoperable for its intended purpose,” *In re Gordon*, 733 F.2d 900, 902 (Fed. Cir. 1984), cannot be used to support a conclusion of obviousness.

## **B. Petitioner’s Proposed Combination of Cassett and Stevens Fails**

Petitioner argues that a person of ordinary skill in the art would have combined elements from Cassett with elements from Stevens in the ways recited in independent claims 1 and 28. This proposed combination fails, because Cassett and Stevens are not combinable.

### **1. Stevens Is Not Analogous Art**

As an initial matter, Stevens is not analogous to the ’633 Patent. Stevens is directed to automating the process of allocating phone costs to employees for calls that are deemed “personal” by the system. (*See* Ex. 1004, Stevens at Abstract (“A

computer implemented system and method of allocating costs of wireless telephone usage.”).) According to Stevens, “the present invention allows a business to automatically allocate and recapture payments from employees for such employees’ personal use of a cell phone or reimburse employees for business use charges on employee-liable cell phones.” (*Id.* at 1:52-56.) Stevens is a system for facilitating accounting/reimbursement related to charges from network carriers. Stevens does not involve collection of information *directly from* the mobile devices themselves -- which is a key element of the solution described in the ’633 Patent. Instead, Stevens’ system “receives billing and usage information *from various wireless service providers* that provide wireless telephone services to employees of company 1106.” (*Id.* at 3:44-48 (emphasis supplied)). Indeed, the cost/billing information, which is the focus of Stevens, cannot be collected ***directly from*** the mobile devices themselves and must be obtained from the network service provider. Accordingly, Stevens is directed to obtaining different data (billing data), from an entirely different source (from a telecommunications carrier/service provider), for an entirely different purpose (allocating costs), than the techniques claimed and described in the ’633 Patent. Stevens is therefore not analogous art, and is therefore not properly used as a basis to cancel the challenged claims. See *In re Clay*, 966 F.2d 656, 659 (Fed. Cir. 1992).

## 2. Cassett and Stevens Are Not Combinable

Even, assuming *arguendo*, that Stevens were analogous art, it is not properly combinable with Cassett. Stevens and Cassett solve different problems using entirely different solutions, and modifying either reference in view of the other would improperly change the “basic principles under which the [prior art] was designed to operate,” (*In re Ratti*, 270 F.2d at 813)) and/or render the prior art “inoperable for its intended purpose” (*In re Gordon*, 733 F.2d at 902).

Cassett discloses a system to be used *by network carriers* (cellular service providers) for network planning and marketing purposes. Cassett notes that the system may generate reports that can be used “to evaluate wireless device performance and/or more efficiently *manage the wireless network*, including: planning for cell site development and equipment purchasing...” (Ex. 1003, Cassett at 4:5-10. *See also, id.* at 9:35-40 (discussing using data to determine “products and services to offer the wireless device, and/or determine changes in the associated network to better suit the observed usage patterns.”) Petitioner proposes modifying Cassett to limit the data being reviewed to data for mobile devices “*associated with a particular enterprise*”. (Pet. at 19-20 (emphasis in original).) However, by modifying Cassett to focus on only one specific enterprise, as suggested by Stevens, the techniques of Cassett would become inoperable for their intended purpose. The interest of the network operator, as

taught in Cassett, is to improve the entire network -- not the portion(s) of its network devoted to a particular customer. Thus, a person of ordinary skill would not be motivated to make the combination that Petitioner has proposed. Instead, the combination appears to be based only on improper hindsight in view of the teachings of the '633 Patent.

Stevens does not receive the mobile device network traffic usage information directly from each of a plurality of mobile devices, as Petitioner concedes. (Pet. at 21.) Petitioner argues there was a motivation to modify Stevens to receive data directly from a mobile device, as taught in Cassett, “to avoid the conversion of information from a carrier-specific format to a common format.” *Id.* However, this modification would change the principle of operation of Stevens, and would render it inoperable for its intended purpose.

Stevens is directed to the allocation and recovery of billed costs for cellular phone usage. (Ex. 1004, Stevens at 3:39-43, Abstract.) The system operates by receiving “billing and usage information *from various wireless service providers that provide wireless telephone service.*” (*Id.* at 3:45-48.) This cost information would only be available from the network carrier not from the devices. Petitioner does not explain how data obtained from the mobile device could be used to calculate the billed cost for a call that is to be allocated, as required to carry out the intended purpose of Stevens. There is no indication in Stevens (or Cassett for that

matter) that the phone or the enterprise would be able to calculate the cost for a call without receiving the calculated charge from the network carrier. Indeed, Stevens suggests precisely the opposite. Stevens explains that one of the reports that could be generated using the techniques disclosed therein can be used to “assist in understanding employees’ cost per minute.” (*Id.* at 11:2-3.) Thus, it is clear from Stevens that a substantial portion of the cost information (i.e. cost per minute) is not known or knowable by the enterprise without obtaining billing data from the carrier. If the data were received only from the phone itself, as Petitioner’s proposed modification would require, the modified version of Stevens would no longer work for its intended purpose of allocating telecommunication costs between business and personal use. Moreover, by modifying Stevens to use data obtained directly from the phones, rather than the carrier, Petitioner has improperly altered the principle of operation of Stevens. For both of these reasons, one of skill in the art would not be motivated to modify Stevens as the Petitioner suggests.

**C. Petitioner Has Failed to Demonstrate a Reasonable Likelihood that the Proposed Cassett-Stevens Combination Renders Any of the Challenged Claims Obvious**

As discussed above, Petitioner has failed to show a reasonable likelihood of prevailing, because its proposed combination is improper. Even assuming, *arguendo*, that the combination were proper, it would fail to disclose the claim elements, as explained below.

## 1. Independent Claims 1 and 28

- a. **“receiving, at a first server, mobile device network traffic usage data directly from each of a plurality of mobile devices associated with a particular enterprise”**

As an initial matter, Petitioner improperly parses this claim element into several smaller pieces in an effort to shoe-horn the Cassett and Stevens references into the scope of the claims. By parsing the claim elements into “sub-elements,” Petitioner has divorced them from other portions of the claim element that give proper context to the proper scope of the claim. This is improper. Nonetheless, MobileIron addresses Petitioner’s arguments below.

Petitioner asserts that Stevens discloses “receiving, at a first server, mobile device network traffic usage data.” (Pet. at 25.) However, as discussed above, Stevens does not disclose this element because the cost/billing information that is processed in Stevens is collected by the network carrier, as Petitioner concedes. (See, e.g., Pet. at 23, 27; Ex. 1004, Stevens at 1:31-33, Figs. 11-12.) And, as properly construed, “mobile device network traffic usage data” is “data collected from a mobile device relating to its use of a network.” In contrast, claims 1 and 28 require that mobile device network traffic usage data be received “*directly from each of a plurality of mobile devices associated with a particular enterprise.*” (Ex. 1001, ’633 Patent, claims 1, 28.)

Petitioner concedes that Cassett does not disclose receiving data from

devices associated with a particular enterprise. (Pet. at 23, 29.)

For at least the foregoing reasons, Cassett and Stevens, alone or in combination, do not disclose or suggest this claim element.

- b. “a first subset of the plurality of mobile devices being associated with a first network service provider and a second subset of the plurality of mobile devices being associated with a second network service provider”**

As support for the contention that Cassett discloses this claim element, Petitioner asserts that Cassett discloses that reports “may be generated comparing the usage pattern of devices associated with different networks service providers.” (Pet. at 30 (citing Ex. 1003, Cassett at 9:48-50.) But, Cassett actually states:

Additionally, usage information may be accumulated *from a plurality of network service providers*, and reports, which may [be] anonymous, may be generated comparing the usage pattern of devices associated with different network service providers.

(Ex. 1003, Cassett at 9:48-50 (emphasis supplied).) Contrary to the claim, Cassett discloses accumulating information that is separately collected from a plurality of network service providers. According to Cassett, each network service provider would have only collected information from devices associated with itself, and then that information could be accumulated with information from other network service providers. (*Id.*) In contrast, claims 1 and 28 require:

receiving, at a first server, mobile device network traffic usage data *directly from each of a plurality of mobile devices* ... a

first subset of the plurality of mobile devices being associated with a first network service provider and a second subset of the plurality of mobile devices being associate with a second network service provider.

(Ex. 1001, '633 patent , Claim 1 (emphasis supplied).) Thus, according to the claim, the first server must receive information *directly from each of a plurality of mobile devices*, some of which are associated with a first network service provider, and some of which are associated with a second network service provider.

Accordingly, Cassett does not disclose this element.

Stevens similarly fails to disclose this element. In Stevens, usage information is collected by the network service provider, *i.e.*, the network carrier, as Petitioner concedes. (*See, e.g.*, Petition, pp. 23, 27; Ex. 1004, Stevens at 1:31-33, Figs. 11-12.) Thus, in Stevens, to have reports containing information for devices associated with more than one network service provider, such information *must* be accumulated from each such network service provider. Indeed, Stevens expressly states “in cases where information is received from multiple carriers, the system converts the information from the carrier-specific format to a common format.” (Ex. 1004, Stevens at 12:59-63.)

Accordingly the combination of Stevens and Cassett does not disclose this element.



## V. CONCLUSION

Because the Petition has failed to demonstrate a reasonable likelihood of prevailing with respect independent claims 1 and 28, it has also failed to demonstrate a reasonable likelihood of prevailing with respect to the claims that depend therefrom (claims 2-27). Accordingly, the Board should deny in its entirety the Petition for *Inter Partes* Review of the '633 Patent.

June 19, 2015

Respectfully submitted,  
BAKER BOTTS L.L.P.

G. Hopkins Guy, III  
Reg. No. 35,886  
1001 Page Mill Road  
Building One, Suite 200  
Palo Alto, CA 94304  
Phone: (650) 739-7510  
Facsimile: (650) 739-7610  
hop.guy@bakerbotts.com

/Eliot D. Williams/  
Eliot D. Williams  
Reg. No. 50,822  
1001 Page Mill Road  
Building One, Suite 200  
Palo Alto, CA 94304  
Phone: (650) 739-7511  
Facsimile: (650) 739-7611  
eliot.williams@bakerbotts.com

ATTORNEYS FOR PATENT OWNER

**CERTIFICATE OF SERVICE ON PATENT OWNER UNDER**  
**37 C.F.R. § 42.105**

Pursuant to 37 C.F.R. § 42.105, the undersigned certifies that on the 19th day of June 2015, a complete and entire copy of this Patent Owner MobileIron Inc.'s Preliminary Response under 37 C.F.R. § 42.107, were provided via electronic mail to the following:

Phillip Bennett  
Nicholas Transier  
EIP US LLP  
2468 Historic Decatur Road  
Suite 200  
San Diego, CA 92106  
pbennett@eip.com  
ntransier@eip.com  
PTAB-SERVICE@eip.com

Respectfully submitted,  
BAKER BOTTS L.L.P  
/Eliot Williams/  
Eliot Williams  
Reg. No. 50,822  
1001 Page Mill Road  
Building One, Suite 200  
Palo Alto, CA 94304  
Phone: (650) 739-7511  
Facsimile: (650) 739-7611  
eliot.williams@bakerbotts.com

G. Hopkins Guy, III  
Back-up Counsel  
Reg. No. 35,886  
1001 Page Mill Road  
Building One, Suite 200  
Palo Alto, CA 94304  
Phone: (650) 739-7510  
Facsimile: (650) 739-7610  
hop.guy@bakerbotts.com

ATTORNEYS FOR PATENT  
OWNER MobileIron, Inc.