Exhibit 13



UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
GARMIN INTERNATIONAL, INC., GARMIN USA, INC., AND GARMIN LTD.
Petitioner
v.
PHILIPS NORTH AMERICA LLC,
Patent Owner

Inter Partes Review Case No. IPR2020-00910

U.S. Patent No. 7,088,233

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,088,233



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	B.	Jacobson	8			
	C.	Say	11			
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	E.	Geva	13			
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	G.	Gabai	16			
VIII.	PRIORITY CLAIMS OF THE '233 PATENT					
	A.	The '493 provisional does not provide written description support for claim 13's "Bluetooth technology" or claim 24-25's "location determination module"	19			
	B.	The '862 provisional and the '165 application each fail to provide written description support for claim 13's "Bluetooth technology"	20			
IX.	CLAIM CONSTRUCTION					
	A.	"means for signaling the bi-directional communications module to transition from the powered-down state to the powered-up state"				
X.	DETAILED EXPLANATION OF THE GROUNDS					
Λ.						
	A.	Ground 1: Claims 1, 7-10, 14 are anticipated by <i>Jacobsen</i>				
		1. Claim 1	22			
		i. [1p] "A bi-directional wireless communication system comprising:"	22			
		J 1 0				



	11.	[1a] "(a) a first personal device, the first personal device further comprising:"	24
	iii.	[1b] "(i) a processor;"	
	iv.	[1c] "(ii) a memory;"	
	v.	[1d] "(iii) a power supply	
	vi.	[1e] "(iv) at least one detector input; and"	
	vii.	[1f] "(v) a short-range bi-directional wireless communications module;"	
	viii.	[1g] "(b) a second device communicating with the first device, the second device having a short-range bidirectional wireless communications module compatible with the short-range bi-directional wireless communications module of the first device; and"	33
	ix.	[1h] "(c) a security mechanism governing information transmitted between the first personal device and the second device."	37
2.	Claim	7	38
	i.	"The system of claim 1, further comprising a detector connected to the at least one detector input."	38
3.	Claim	8	
<i>J</i> .	i.	"The system of claim 7, wherein the detector	70
	1.	senses body or physiological parameters."	40
4.	Claim	9	
	i.	"The system of claim 8, wherein the body or physiological parameters are selected from the group consisting of temperature, motion, respiration, blood oxygen content, and	
5	Claim	electroencephalogram."	
5.		"The greature of claim 1 systemain the first margarel	42
	1.	"The system of claim 1, wherein the first personal device further comprises a user interface module."	42
6.	Claim	14	44



		i.	"The system of claim 1, wherein the first personal device further comprises a data input/output port, the second device further comprises a data input/output port, and wherein the second device communicates with the first personal device using the data input/output ports."	1/		
В.	Ground 2: Claims 1, 7-10, 14 are obvious over Say					
ъ.	1.		n 1			
	1.	i.	Claim element [1p]			
		ii.	Claim element [1a]			
		iii.	Claim element [1b]			
		iv.	Claim element [1c]			
		v.	Claim element [1d]			
		v. vi.	Claim element [1e]			
		vi. Vii.	Claim element [1f]			
		v 11. Viii.	Claim element [1g]			
		ix.	Claim element [1h]			
	2.		n 7			
	3.		n 8			
	<i>3</i> . 4.	Claim 9				
	5.	Claim 10				
	6.	Claim 14				
C.	•			, OC		
С.	Ground 3: Claims 1, 7-10, 14 are obvious over <i>Jacobsen</i> in view of <i>Say</i>					
	1.	Claim 1				
		i.	Claim elements 1[a]-[g]			
		ii.	Claim elements 1[h]			
	2.	Clair	ns 7-10, 14			
D.	Grou	Ground 4: Claim 13 is obvious over <i>Jacobsen</i> in view of <i>Say</i>				
		and Quy				
	1.	Clair	n 13	72		



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