

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HTC CORPORATION; HTC AMERICA, INC.; SAMSUNG ELECTRONICS
CO., LTD.; and SAMSUNG ELECTRONICS AMERICA, INC.
Petitioner

v.

E-WATCH, INC. and E-WATCH CORPORATION
Patent Owner

CASE IPR2014-00989¹
Patent No. 7,643,168

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

¹ Case IPR2015-00543 has been joined with this proceeding.

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. RESPONSE TO PATENT OWNER'S ARGUMENTS	1
A. PO's claim construction fails to comply with the broadest reasonable interpretation standard.....	1
1. Retained Visual Image Data	1
2. Compressed Visual Image Data.....	3
3. Compressed Digital Image Data	4
B. The combination of Morita and Sarbadhikari teaches or suggests all limitations of claims 1-6, 8, 10-11, 13-15, 21-29, and 31 (Ground 1)	5
1. The combination of Morita and Sarbadhikari teaches or suggests compression of retained visual image data	5
2. The combination of Morita and Sarbadhikari teaches or suggests transmission of compressed image data	7
C. The combination of Morita, Sarbadhikari and Longginou teaches or suggests all the feature of claims 16-18 (Ground 2)	8
1. Storage of Compressed Image Data.....	8
2. Transmission Protocol Algorithm.....	9
D. The combination of Wilska and Yamagishi-992 teaches or suggests all limitations in claims 1, 22, 24, 26, 27 and 29 (Ground 3)	13
1. The combination of Wilska and Yamagishi-992 teaches or suggests compression of retained visual image data	13
2. The combination of Wilska and Yamagishi-992 teaches or suggests wireless transmission of compressed digital data	15
3. The combination of Wilska and Yamagishi-992 describes providing compressed image data.....	15

TABLE OF CONTENTS

	Page
E. Claim 16 is obvious over the combination of Wilska and Yamagishi-992	23
F. PO's stated reasons for Petitioner's allegedly flawed obviousness arguments against claim 16 are without merit.....	24
III. CONCLUSION.....	25

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>EPOS Techs. Ltd. v. Pegasus Techs. Ltd.</i> , 766 F.3d 1338 (Fed. Cir. 2014)	3, 22
<i>Vivid Techs., Inc. v. Am. Sci. & Eng'r, Inc.</i> , 200 F.3d 795 (Fed. Cir. 1999)	8, 9, 14
<i>Nichia v. Emcore</i> , IPR2013-00005, Final Written Decision, Paper 68 (Feb. 11, 2014)	3

EXHIBIT LIST

Exhibit #	Brief Description
1001	U.S. Patent No. 7,643,168 B2 to David A. Monroe ("the '168 Patent")
1002	Certified Translation of the Japanese Patent Application Publication No. H06-133081 to Morita ("Morita") and the corresponding Japanese language patent application
1003	U.S. Patent No. 5,477,264 to Sarbadhikari <i>et al.</i> ("Sardabhikari")
1004	PCT Application Publication No. WO 95/23485 to Longginou ("Longginou")
1005	U.K. Patent Application GB 2,289,555 A to Wilska <i>et al.</i> ("Wilska")
1006	European Patent Application Publication No. 0594992 A1 to Yamagishi ("Yamagishi-992")
1007	U.S. Patent No. 5,550,754 B2 to McNelley <i>et al.</i> ("McNelley")
1008	Declaration of Kenneth Parulski including Attachments A-D
1009	Rebuttal Declaration of Kenneth Parulski in Support of Petitioner's Reply to Patent Owner's Response of February 20, 2015
1010	Select Sections of e-Watch Preliminary Infringement Contentions

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.