UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
SAMSUNG ELECTRONICS CO., LTD; SAMSUNG ELECTRONICS AMERICA, INC.,
Petitioners, v.
AFFINITY LABS OF TEXAS, LLC,
Patent Owner.
Case IPR2014-01181 ¹
Patent No. 8,532,641 B2

PATENT OWNER'S RESPONSE

¹ Cases IPR2014-01182 and IPR2014-01184 have been consolidated with the instant proceeding.



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a.	For claim 1, Abecassis does not disclose a rechargeable power supply.
b.	Abecassis does not disclose a physical interface having a first and a second conductive path, the physical interface operable to communicate data via the first conductive path and to receive a recharging power for the rechargeable power supply via the second conductive path.
c.	Abecassis does not disclose a "collection of instructions" that are "operable when executed to communicate a collection of information about media content available from the wireless telephone device to a recipient device such that the recipient device can use the collection of information to generate a graphical menu comprising a selectable menu item associated with the available media content."
d.	Abecassis and Chennakeshu do not disclose "stream[ing] a signal representing at least a portion of a song to the recipient device using a given asynchronous wireless channel of a localized communications signaling network."
e.	For claim 2, the proposed combination does not disclose "the wireless communication module is compliant with a Bluetooth standard."
f.	For claim 5, Abecassis and Chennakeshu do not inherently disclose "the collection of instructions comprises a set of hands-free telephone instructions operable when executed to allow the wireless telephone device to operate in a hands-free mode when the wireless telephone device is wirelessly coupled with a wireless component of an automobile."
g.	For claim 9, Abecassis and Herrod do not disclose "a rechargeable power source located within the enclosure."
h.	For claim 9, Abecassis and Herrod do not disclose "a non-circular physical interface having a first and a second conductive path, the non-circular physical interface operable to communicate data via the first conductive path and to receive a recharging power for the rechargeable power supply via the second conductive path."



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