

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD; SAMSUNG ELECTRONICS
AMERICA, INC.; SAMSUNG TELECOMMUNICATIONS

AMERICA, LLC

PETITIONERS

V.

AFFINITY LABS OF TEXAS, LLC

PATENT OWNER

CASE IPR2014-01182

PATENT 8,532,641

**PATENT OWNER'S PRELIMINARY RESPONSE TO
PETITIONERS' CORRECTED PETITION FOR INTER PARTES REVIEW
OF UNITED STATES PATENT NO. 8,532,641**

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A. Abecassis does not disclose a rechargeable power supply.....34

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.35

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.”36

D. Abecassis does 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.”39

E. Abecassis does not disclose a wireless communication module compliant with a Bluetooth standard.....40

F. Abecassis does not disclose “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.”.....41

G. Abecassis does not disclose a display that “makes up more than half of the front surface” or a “wireless telephone device” that “is operable to receive a collection of data representing a media at a hybrid of wireless communication rates that includes at least one faster rate and one slower rate.”42

H. Abecassis does not disclose a “buffer memory located within [an] enclosure, wherein the wireless telephone device is operable to receive media content as a series of component parts, further wherein the wireless telephone device is operable to receive a component part of the media content at a wireless communication rate and a different component part of the media content at a different wireless communication rate, wherein the wireless telephone device is operable to cause a change in communication rates at which a given component part is received based at least partially upon an amount of data located in the buffer memory.”44

VI. TREYZ FAILS TO DISCLOSE A WIRELESS TELEPHONE DEVICE, OR A PORTABLE ELECTRONIC DEVICE, WITH EACH OF THE CLAIMED FEATURES.45

A. Treyz does not disclose a rechargeable power supply.....45

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C. Treyz does 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.”47

D. Treyz does not disclose recognizing receipt of an incoming telephone call to alter an outputting of a signal.48

E. Treyz does not disclose a “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.”49

F. Treyz does not disclose “a display that makes up more than half of the front surface” or a “wireless telephone device” that is operable to receive a collection of data representing a media at a hybrid of wireless communication rates that includes at least one faster rate and one slower rate.49

G. Treyz does not disclose a “buffer memory located within the enclosure, wherein the wireless telephone device is operable to receive media content as a series of component parts, further wherein the wireless telephone device is operable to receive a component part of the media content at a wireless communication rate and a different component part of the media content at a different wireless communication rate, wherein the wireless telephone device is operable to cause a change in communication rates at which a given component part is received based at least partially upon an amount of data located in the buffer memory.”51

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