

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY COMPUTER ENTERTAINMENT AMERICA LLC
Petitioner

v.

APLIX IP HOLDINGS CORPORATION
Patent Owner

Case No. IPR2015-00229
Patent No. 7,667,692

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,667,692**

TABLE OF CONTENTS

TABLE OF CONTENTS 1

I. INTRODUCTION 1

II. SUMMARY OF THE ‘692 PATENT 1

 A. DESCRIPTION OF THE ALLEGED INVENTION OF THE ‘692 PATENT 1

 B. SUMMARY OF THE PROSECUTION HISTORY OF THE ‘692 PATENT 4

III. REQUIREMENTS FOR INTER PARTES REVIEW UNDER 37 C.F.R. § 42.104 5

 A. GROUNDS FOR STANDING UNDER 37 C.F.R. § 42.104(A) 5

 B. IDENTIFICATION OF CHALLENGE UNDER 37 C.F.R. § 42.104(B) AND RELIEF REQUESTED 5

 1. The Grounds For Challenge 6

 2. Claim Construction Under 37 C.F.R. § 42.104(b)(3) 7

 3. Level of Skill of a Person Having Ordinary Skill in the Art 8

IV. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS OF THE ‘692 PATENT ARE UNPATENTABLE 8

 A. LIEBENOW ANTICIPATES CLAIMS 1-3, 5, 7-10, 12, 13, 15-18 AND 20 8

 B. LIEBENOW IN VIEW OF ARMSTRONG RENDERS CLAIMS 1-3 AND 5-10 OBVIOUS 27

 C. LIEBENOW IN VIEW OF HEDBERG RENDERS CLAIMS 1-3, 5, 7-13, 15-20 OBVIOUS 30

 D. GRIFFIN ANTICIPATES CLAIMS 1, 2, 7-10, 12, 15-18 AND 20 32

 E. GRIFFIN IN VIEW OF ARMSTRONG RENDERS CLAIMS 1, 2, AND 6-10 OBVIOUS 45

 F. GRIFFIN IN VIEW OF HEDBERG RENDERS CLAIMS 1, 2, 7-12, AND 15-20 OBVIOUS 46

 G. REKIMOTO ANTICIPATES CLAIMS 1-3, 12, 13, 17; ALTERNATIVELY, REKIMOTO IN VIEW OF LIEBENOW RENDERS CLAIMS 1-3, 5, 7-10, 12, 13, 15-18, AND 20 OBVIOUS 47

V. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1) 59

 A. REAL PARTIES-IN-INTEREST AND RELATED MATTERS 59

 B. LEAD AND BACK-UP COUNSEL UNDER 37 C.F.R. § 42.8(B)(3) 59

 C. PAYMENT OF FEES UNDER 37 C.F.R. § 42.103 60

VI. CONCLUSION 60

I. INTRODUCTION

Petitioner Sony Computer Entertainment America LLC (“Petitioner”) requests an *Inter Partes* Review (“IPR”) of claims 1-3, 5-13, and 15-20 (collectively, the “Challenged Claims”) of U.S. Patent No. 7,667,692 (“the ‘692 Patent”) issued on February 23, 2010 to Beth Marcus et al. (“Applicants”). **Exhibit 1001**, *‘692 Patent*.

The alleged invention of the ‘692 Patent relates to a hand-held electronic device that has two input assemblies, i.e., one assembly on the front side of the device and another assembly on the back. The Challenged Claims of the ‘692 Patent were allowed only because the prior art purportedly did not disclose a second input assembly with an input element that could be selectively mapped to one or more input functions of a selected application. As this Petition demonstrates, however, there is a wealth of prior art that discloses precisely this element. For example, one of the references (Liebenow) discloses a touch sensitive panel on the back side of a hand-held device that may be defined as keys of a keyboard, and which can be selectively mapped to different functions. Since the prior art clearly discloses all elements of the Challenged Claims, this Petition should be granted.

II. SUMMARY OF THE ‘692 PATENT

A. Description of the Alleged Invention of the ‘692 Patent

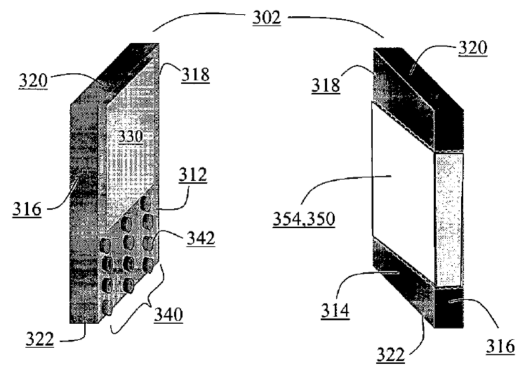
The ‘692 Patent describes user interface and input mechanisms for hand-held electronic devices, such as cell phones and Personal Digital Assistants (PDAs). *See e.g.*, **Ex. 1001**, at 1:15-21; 7:11-15. The ‘692 Patent specification discloses an electronic

device 100 having embedded software, firmware, or software applications that require input from the user in order to perform various functions. *Id.* at 7:15-22, 8:1-18. The applications may include, for example, word processing, e-mail, or game applications. *Id.* at 5:44-54; 7:15-22, 8:1-18. The user provides inputs via input elements such as keys, buttons, pressure sensor pads, touch pads, or other elements. *Id.* at 7:59-63; *see also, id.* at 9:5-13; 15:12-16. One or more input elements are grouped together in “input assemblies.” *Id.* at 7:55-59. In one embodiment, the electronic device has a first and second input assembly with each input assembly having associated input elements. *Id.* at 8:47-63; Figs. 3A-3B. The electronic device also includes an input controller 216 that receives electronic signals from the input elements associated with input assemblies 206 and 208 and converts them “into a form suitable to be received and interpreted by processor 104.” *Id.* at 7:63-67; *see also, id.* at Fig. 2. A processor 104 subsequently interprets the signals output by the input controller 216 as specific input commands for a particular application. *Id.* at 7:66-8:16. For example, if a text application is running, then the input controller may map a key input to a particular character, or if a game application is running, then the key input may be mapped to a particular game function. *Id.* The input controller 216 also may map one or more of the input elements to functions specific to a particular application. *Id.* at 8:8-26. The input functions of input elements may change depending on the application that is being executed. *Id.*

The ‘692 Patent discloses arranging the input assemblies in a way that increases

*Petition for Inter Partes Review of
U.S. Patent No. 7,667,692*

data input efficiency based on thumb-finger opposition arrangement of the human user's hand. For example, in one disclosed embodiment, the first input assembly 340, which includes input elements such as keys or buttons 342 to be actuated by the user's thumbs, is located on the front-side surface of the device 312 and the second input assembly 350, which includes input elements such as a pressure sensor pad 354 to be actuated by the user's fingers, is located on the back-side surface of the device 314:



Id. at Figs. 3A, 3B.

The pressure sensor pad 354 on the back-side surface 314 is divided into one or more “delineated active areas,” which may be utilized for different programmable functions depending on the selected application. *Id.* at 9:24-40; Fig. 3d. The ‘692 Patent specification discloses that an active area can be “delineated” either because it is physically delineated from other active areas (e.g., the areas physically appear as rectangular, oblong, or other shapes) or the user is able to use their fingers to tactilely discriminate between the delineated active areas. *Id.* at 9:27-10:9.

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