UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC. Petitioner v.

E-WATCH, INC. Patent Owner

Case: IPR2015-00412

Patent No. 7,365,871

Title: Apparatus For Capturing, Converting And Transmitting A Visual Image Signal Via A Digital Transmission System

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. §42.107

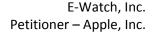




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EXHIBIT LIST

[EXH. 2001] TABLE SHOWING OTHER INTER PARTES REVIEW
PETITIONS WITH PRIOR ART AND/OR ISSUES THAT
OVERLAP WITH IPR2015-00412 PETITION ("this
petition" or "the '412 Petition")

[EXH. 2002] DEFENDANTS' INVALIDITY CONTENTIONS IN PARALLEL DISTRICT COURT LITIGATION (REDACTED VERSION)



I. SUMMARY OF PATENT OWNER'S PRELIMINARY RESPONSE TO PETITIONER'S INTER PARTES REVIEW PETITION

e-Watch, Inc. ("e-Watch") is the owner of United States Patent No. 7,365,871 ("'871 Patent"). Eleven (11) inter partes review ("IPR") petitions have been filed related to the '871 Patent. The table below provides an update on the petitioners/real parties-in-interest, status and filing date of each of these proceedings.

Petitioner/Real	Case Number	Status	Filing Date
Parties-in-Interest			
Iron Dome LLC,	IPR2014-00439	Terminated	2/18/2014
RozMed LLC, Steven			
S. Yu (collectively,			
"Iron Dome")			
HTC Corporation and	IPR2014-00987	Instituted	6/19/2014
HTC America, Inc.			
(collectively, "HTC")			
LG Electronics, Inc.,	IPR2015-00402	No Decision on	12/10/2014
LG Electronics		Institution	
U.S.A., Inc., LG			
Electronics			
Mobilecomm U.S.A.,			
Inc. (collectively,			
"LG"); Microsoft			
Mobile OY,			
Microsoft			
Corporation, Nokia			
Inc. (collectively,			
"MMO"); Sony			
Corporation, Sony			
Mobile			
Communications			
(USA) Inc., Sony			



Mobile Communications AB, Sony Mobile Communications Inc. (collectively, "Sony"); Sharp Corporation and Sharp Electronics Corporation (collectively,			
"Sharp") Kyocera Communications, Inc. ("Kyocera")	IPR2015-00406	No Decision on Institution	12/10/2014
LG, MMO, Sony and Sharp	IPR2015-00404	No Decision on Institution	12/10/2014
Apple Inc. ("Apple")	IPR2015-00411	No Decision on Institution	12/11/2014
Apple	IPR2015-00412	No Decision on Institution	12/11/2014
Apple	IPR2015-00413	No Decision on Institution	12/11/2014
Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. (collectively, "Samsung")	IPR2015-00541	Joined With 2014- 00987	1/7/2015
Samsung	IPR2015-00610	No Decision on Institution	1/23/2015
Samsung	IPR2015-00612	No Decision on Institution	1/23/2015

These eleven (11) IPR petitions have substantial overlap with respect to the prior art cited and associated grounds of unpatentability. Even to the extent different prior art is cited in some of these petitions, the prior art relied on in some of the petitions is similar to the prior art contained in some of the other petitions.



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