

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**APPLE, INC.**

**Petitioner**

**v.**

**E-WATCH, INC.**

**Patent Owner**

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**Case: IPR2015-00412**

**Patent No. 7,365,871**

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

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

E-Watch, Inc.  
Petitioner – Apple, Inc.

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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.

| <b>Petitioner/Real Parties-in-Interest</b>  | <b>Case Number</b> | <b>Status</b>              | <b>Filing Date</b> |
|---|--------------------|----------------------------|--------------------|
| Iron Dome LLC, RozMed LLC, Steven S. Yu (collectively, “Iron Dome”)   | IPR2014-00439      | Terminated                 | 2/18/2014          |
| HTC Corporation and HTC America, Inc. (collectively, “HTC”)   | IPR2014-00987      | Instituted                 | 6/19/2014          |
| LG Electronics, Inc., LG Electronics 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 | IPR2015-00402      | No Decision on Institution | 12/10/2014         |

|   |               |                            |            |
|---|---------------|----------------------------|------------|
| 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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