

**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: IPR2015-00413**

**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.

**TABLE OF CONTENTS**

**I.** SUMMARY OF PATENT OWNER’S PRELIMINARY RESPONSE TO  
PETITIONER’S INTER PARTES REVIEW PETITION ..... 1

**II.** REASONS WHY INTER PARTES REVIEW SHOULD NOT BE  
INSTITUTED..... 4

**A.** PETITIONER USES CUMULATIVE AND REDUNDANT  
PRIOR ART IN ITS PETITION..... 4

**B.** THIS PETITION IS AN IMPROPER SERIAL INTER PARTES  
REVIEW PETITION..... 5

**C.** THERE IS NO RATIONAL UNDERPINNING TO THE  
OBVIOUSNESS ASSERTIONS OF THE PETITION ..... 8

**III.** CONCLUSION..... 11

    CERTIFICATE OF SERVICE ..... 13

## **EXHIBIT LIST**

[EXH. 2001] TABLE SHOWING OTHER INTER PARTES REVIEW PETITIONS WITH PRIOR ART AND/OR ISSUES THAT OVERLAP WITH IPR2015-00413 PETITION (“this petition” or “ the ’413 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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