

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.

Petitioner

v.

E-WATCH, INC.

Patent Owner

Case: IPR2015-00414

Patent No. 7,643,168

**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**

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.	PETITION USES REDUNDANT ALLEGED PRIOR ART	4
B.	PETITIONER CITES IMPROPER SUBJECT MATTER FOR INTER PARTES REVIEW	5
III.	CONCLUSION.....	8
	CERTIFICATE OF SERVICE	9

EXHIBIT LIST

Currently Filed – Patent Owner

[EXH. 2001] TABLE SHOWING OTHER INTER PARTES REVIEW
PETITIONS WITH PRIOR ART AND/OR ISSUES THAT
OVERLAP WITH IPR2015-00414 (“this petition”)

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. 7,643,168 (“’168 Patent”). Eight (8) inter partes review (“IPR”) petitions have been filed related to the ‘168 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 Parties-in-Interest	Case Number	Status	Filing Date
HTC Corporation and HTC America, Inc. (collectively, “HTC”)	IPR2014-00989	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 Mobile Communications AB, Sony Mobile	IPR2015-00401	No Decision on Institution	12/10/2014

Communications Inc. (collectively, "Sony"); Sharp Corporation and Sharp Electronics Corporation (collectively, "Sharp")			
Kyocera Communications, Inc. ("Kyocera")	IPR2015-00407	No Decision on Institution	12/10/2014
LG, MMO, Sony and Sharp	IPR2015-00408	No Decision on Institution	12/10/2014
Apple Inc. ("Apple")	IPR2015-00414	No Decision on Institution	12/11/2014
Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. (collectively, "Samsung")	IPR2015-00543	Joined With 2014-00989	1/7/2015
Samsung	IPR2015-00607	No Decision on Institution	1/23/2015
Samsung	IPR2015-00611	No Decision on Institution	1/23/2015

These eight (8) 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 the later-filed petitions is similar to the prior art contained in some of the earlier-filed petitions. As a result, many of these petitions, including this petition (i.e., IPR2015-00414), are redundant and present cumulative prior art (i.e., alleged prior art or otherwise) and substantially the same arguments as other earlier-filed IPR

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.