

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS AMERICA, INC.**

Petitioner

v.

E-WATCH, INC.

Patent Owner

Case: IPR2015-00611

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**

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EXHIBIT LIST

Currently Filed – Patent Owner

[EXH. 2001] TABLE SHOWING OTHER INTER PARTES REVIEW PETITIONS WITH PRIOR ART AND/OR ISSUES THAT OVERLAP WITH IPR2015-00611 (“this petition”)

[EXH. 2002] DEFENDANTS’ AMEDNED 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. 7,643,168 (“’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., IPR2015-00611), are redundant and present cumulative prior art (i.e., alleged prior art or otherwise) and substantially the same arguments as other earlier-filed IPR

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