UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG Electronics, Inc., Petitioner

v.

Core Wireless Licensing S.a.r.l., Patent Owner.

Patent No. 8,434,020

Issue Date: April 30, 2013

Title: Computing Device with Improved User Interface for Applications

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT 8,434,020 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.100 ET SEQ.

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Exhibit	Description
1001	U.S. Patent No. 8,434,020 (Issued April 30, 2013), <i>Computing device with improved user interface for applications</i> ("the '020 Patent")
1002	U.S. Patent No. 6,415,164 to Blanchard et al. ("Blanchard")
1003	U.S. Patent No. 7,225,409 to Schnarel et al. ("Schnarel")
1004	Declaration of Dr. Rhyne Regarding Invalidity Of U.S. Patent No. 8,434,020
1005	File history of U.S. Patent No. 8,434,020

LG Electronics, Inc. ("Petitioner") hereby seeks *inter partes* review of Claims 1, 2, 5, 6, 7, 8, 10, 11, 13, and 16 of U.S. Patent No. 8,434,020. (Ex. 1001 (the "020 patent").)

I. <u>COMPLIANCE WITH REQUIREMENTS FOR A PETITION FOR</u> <u>INTER PARTES REVIEW</u>

A. Notice of Real Party in Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), notice is hereby given that the real partiesin-interest in this petition are the Petitioner and LG Electronics U.S.A., Inc., and LG Electronics Mobilecomm U.S.A., Inc.

B. Notice of Related Matters

Petitioner is also seeking *inter partes* review of related U.S. Patent No. 8,713,476, a continuation of the '020 Patent. If instituted, Petitioner requests that each of the related *inter partes* review proceedings be assigned to the same panel for administrative efficiency and consistency. Furthermore, the following pending federal district court litigations may affect or be affected by the decision in this proceeding:

- Core Wireless Licensing S.A.R.L. v. LG Electronics, Inc. et al., Civ. No. 2:14-cv-911 (E.D. Tex.) (the "Related LG Case");
- Core Wireless Licensing S.A.R.L. v. Apple, formerly Civ. No. 6:14-cv-00751 (E.D. Tex.), and Core Wireless Licensing S.A.R.L. v. Apple, formerly Civ. No. 6:14-cv-00752 (E.D. Tex.), now both pending transfer to the Northern District Of California (the "Related Apple Cases").

C. Notice of Lead and Backup Counsel and Service Information

Pursuant to 37 C.F.R. §§ 42.8(b)(3), (b)(4), and 42.10(a), Petitioner designates

the following lead and backup counsel:

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D. Grounds for Standing

Petitioner certifies under 37 C.F.R. § 42.104(a) that the '020 patent is available for *inter partes* review, and that Petitioner is not barred or estopped from requesting an *inter partes* review on the grounds identified in the petition.

E. Statement of Precise Relief Requested

Petitioner respectfully requests that claims 1, 2, 5, 6, 7, 8, 10, 11, 13, and 14 of the '020 patent (Ex. 1001) be cancelled based on the following grounds of unpatentability, explained in detail below.

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