

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.

Case IPR2015-01985
Patent 8,713,476 B2

PATENT OWNER'S RESPONSE

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LIST OF PATENT OWNER'S EXHIBITS

<u>Exhibit</u>	<u>Description</u>
2001	Declaration of Scott A. Denning (“Denning”)
2002	Transcript of Deposition of Dr. V. Thomas Rhyne, III, dated April 28, 2016 (“Rhyne”)
2003	Memorandum Opinion and Order on Claim Construction in <i>Core Wireless Licensing S.A.R.L. v. LG Electronics, Inc. et al.</i> , Case No. 2:14-cv-911-JRG-RSP
2004	Partial Trial Transcript in <i>Core Wireless Licensing S.A.R.L. v. LG Electronics, Inc. et al.</i> , Case No. 2:14-cv-911-JRG-RSP
2005	User Manual for Ericsson R380 dated October 2000
2006	User Manual for Motorola StarTAC 3000
2007	U.S. Patent No. 5,392,337 to Baals <i>et al.</i> (“Baals”)
2008	U.S. Patent No. 6,781,611 to Richard (“Richard”)
2009	U.S. Patent No. 6,993,328 to Oommen (“Oommen”)
2010	<i>PPC Broadband, Inc. v. Corning Optical Commc’ns</i> , Case No. 2015-1361 <i>et al.</i> (Fed. Cir. Feb. 22, 2016)

I. Introduction

Petitioner LG Electronics, Inc. challenges claims 1, 4, 5, 6, 8, 9, 20, 26, 27, and 29 of U.S. Patent No. 8,713,476 to Martyn (Ex. 1001 or the “‘476 patent”) as allegedly obvious under 35 U.S.C. § 103(a) over U.S. Patent No. 6,415,164 to Blanchard *et al.* (Ex. 1002 or “Blanchard”) alone. Petitioner supported its challenges with the Declaration of Vernon Thomas Rhyne, III (“Rhyne” or Ex. 1004). However, the Board should confirm the patentability of these challenged claims over Blanchard because Blanchard fails to disclose or suggest every feature of the challenged claims, and Rhyne’s conclusory analysis fails to shore up the gaps in Blanchard’s disclosure. These deficiencies are explained in depth below, with support from the Declaration of Scott A. Denning (Ex. 2001 or “Denning”).

The ‘476 patent’s claims are directed generally to a device that is configured to display a main menu listing at least one unlaunched application. The device is also configured to display an application summary window that can be reached directly from the main menu. The ‘476 patent specification describes an embodiment’s application summary window as a “snap-shot” view of an application listed in the window that “brings together, in one summary window, a limited list of common functions and commonly accessed stored data” associated

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