

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. 8,713,476

Issue Date: April 30, 2013

Title: Computing Device with Improved User Interface for
Applications

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT 8,713,476 UNDER
35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.100 ET SEQ.**

TABLE OF CONTENTS

TABLE OF EXHIBITSiii

I. COMPLIANCE WITH REQUIREMENTS FOR A PETITION FOR *INTER PARTES* REVIEW.....1

 A. Notice of Real Party in Interest.....1

 B. Notice of Related Matters.....1

 C. Notice of Lead and Backup Counsel and Service Information.....2

 D. Grounds for Standing2

 E. Statement of Precise Relief Requested2

II. FACTUAL BACKGROUND3

 A. The '476 Patent3

 B. The Prosecution History Of The '476 Patent4

 C. The Challenged Claims6

 D. The Prior Art.....7

 1. Blanchard.....9

 2. Schnarel.....11

III. RELEVANT INFORMATION CONCERNING THE CONTESTED PATENT12

 A. Person of Ordinary Skill in the Art.....12

 B. Claim Construction.....13

 1. “computing device”13

 2. “reached directly from the main menu”13

IV. SPECIFIC GROUNDS FOR PETITION14

 A. Blanchard Renders Obvious All Of The Challenged Claims.....14

 B. Schnarel Renders Obvious All Of The Challenged Claims22

V. CONCLUSION.....35

CERTIFICATE OF SERVICE.....36

TABLE OF EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 8,713,476 (Issued April 30, 2013), <i>Computing device with improved user interface for applications</i> (“the ‘476 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. 8,713,476
1005	File history of U.S. Patent No. 8,713,476
1006	File history of U.S. Patent No. 8,434,020

LG Electronics, Inc. (“Petitioner”) hereby seeks *inter partes* review of Claims 1, 4, 5, 6, 8, 9, 20, 26, 27, and 29 of U.S. Patent No. 8,713,476. (Ex. 1001 (the “476 patent”).)

I. COMPLIANCE WITH REQUIREMENTS FOR A PETITION FOR INTER PARTES REVIEW

A. Notice of Real Party in Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), notice is hereby given that the real parties-in-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. 8,434,020, a parent of the ‘476 Patent. If instituted, Petitioner requests that each of the related *inter partes* review proceedings be assigned to the same Board for administrative efficiency. Furthermore, the following pending federal district court litigations may affect or be affected by the decision in this proceeding:

1. *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”);
2. *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:

Lead Counsel:	Herbert H. Finn (Reg. No. 38,139) Greenberg Traurig, LLP 77 W. Wacker Dr., Suite 3100 Chicago, IL 60601 Telephone: (312) 456-8400 Fax: (312) 456-8435 Email: finnh@gtlaw.com; LG-CoreWireless-IPR@gtlaw.com	
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D. Grounds for Standing

Petitioner certifies under 37 C.F.R. § 42.104(a) that the '476 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, 4, 5, 6, 8, 9, 20, 26, 27, and 29 of the '476 patent (Ex. 1001) be cancelled based on the following grounds of unpatentability, explained in detail below.

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