

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 PRELIMINARY RESPONSE TO
PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,713,476 UNDER 35 USC §§ 311-319 AND 37 CFR
§42.100 ET SEQ.

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35 U.S.C. § 314(a)	1
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I. INTRODUCTION

Petitioner seeks *inter partes* review of claims 1, 4-6, 8, 9, 20, 26, 27 and 29 of U.S. Patent 8,713,476 (“the ’476 Patent”). The Patent Trial and Appeal Board (“PTAB” or “Board”) should not institute *inter partes* review of the ’476 Patent because Petitioner has not met its burden to show a reasonable likelihood that it would prevail with respect to at least one of the challenged claims.¹

The following grounds are asserted by Petitioner:

References	Basis	Claims Challenged
Blanchard ²	§ 103	1, 4-6, 8, 9, 20, 26, 27, 29
Schnarel ³	§ 103	1, 4-6, 8, 9, 20, 26, 27, 29

¹ 35 U.S.C. § 314(a) (An *inter partes* review may be instituted only if “the information presented in the petition . . . and any response . . . shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.”); 37 C.F.R. § 42.108(c).

² Blanchard et al., U.S. Patent No. 6,415,164 (Ex. 1002)

³ Schnarel et al., U.S. Patent No. 7,225,409 (Ex. 1003)

As explained in detail below, Blanchard fails to teach or suggest “an application summary that can be reached directly from the menu” and “wherein the application summary is displayed while the one or more applications are in an un-launched state”, as recited in independent claims 1 and 20. As further explained in detail below, Schnarel fails to teach or suggest “an application summary that can be reached directly from the menu”, as recited in independent claims 1 and 20. Accordingly, Petitioner has not met (and cannot meet) its burden, and so no *inter partes* review should be instituted on the proposed grounds.

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