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Filed on behalf of K/S HIMPP

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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K/S HIMPP,  
Petitioner

v.

III HOLDINGS 4, LLC,  
Patent Owner

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Case No. IPR2017-00783

Patent No. 9,191,756

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PETITION FOR *INTER PARTES* REVIEW

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## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8.....	2
	A. Real Party-in-Interest .....	2
	B. Related Matters Under 37 C.F.R. § 42.8(b)(2) .....	2
	C. Lead and Back-Up Counsel.....	3
	D. Service Information Under 37 C.F.R. § 42.8(b)(4).....	3
III.	PAYMENT OF FEES .....	4
IV.	CERTIFICATION OF GROUNDS FOR STANDING .....	4
V.	OVERVIEW OF CHALLENGE AND RELIEF REQUESTED.....	5
	A. Prior Art Patents and Printed Publications.....	6
VI.	SUMMARY OF THE '756 PATENT .....	7
	A. Brief Description of the '756 Patent .....	7
	B. Summary of the Prosecution History of the '756 Patent .....	7
	C. The Purported Novelty of the '756 Patent and the State of the Art.....	9
	D. Level of Ordinary Skill in the Art.....	10
VII.	CLAIM CONSTRUCTION .....	11
	A. “smart phone”.....	11
	B. “communication channel” .....	13
VIII.	OVERVIEW OF PRIOR ART REFERENCES.....	14
	A. Waters.....	14
	B. Anderson .....	16

C.	Teller.....	16
D.	Rajann.....	17
IX.	THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE '756 PATENT IS UNPATENTABLE .....	18
A.	Ground 1: Claims 1-5, 7, 9-10, 12-14, and 18-20 Are Rendered Obvious by the Combination of Waters and Anderson .....	18
1.	The law of obviousness.....	18
2.	Claim 1 is obvious over Waters and Anderson .....	19
3.	Claim 2 is obvious over Waters and Anderson .....	30
4.	Claim 3 is obvious over Waters and Anderson .....	31
5.	Claim 4 is obvious over Waters and Anderson .....	34
6.	Claim 5 is obvious over Waters and Anderson .....	36
7.	Claim 7 is obvious over Waters and Anderson .....	37
8.	Claim 9 is obvious over Waters and Anderson .....	38
9.	Claim 10 is obvious over Waters and Anderson .....	39
10.	Claim 12 is obvious over Waters and Anderson .....	40
11.	Claim 13 is obvious over Waters and Anderson .....	41
12.	Claim 14 is obvious over Waters and Anderson .....	42
13.	Claim 18 is obvious over Waters and Anderson .....	43
14.	Claim 19 is obvious over Waters and Anderson .....	47
15.	Claim 20 is obvious over the combination of teachings of Waters and Anderson.....	48
B.	Ground 2: Claim 8 is Rendered Obvious by the Combination of Waters, Anderson, and Rajann.....	49

..

1.	“The smart phone of claim 7, wherein a rate of the tones is increased as a signal strength of the communication channel increases.” .....	49
C.	Ground 3: Claims 11 and 16-17 Are Rendered Obvious by the Combination of Waters, Anderson, and Teller .....	51
1.	Claim 11 is obvious over Waters, Anderson, and Teller .....	51
2.	Claim 16 is obvious over Waters, Anderson, and Teller .....	56
3.	Claim 17 is obvious over Waters, Anderson, and Teller .....	58
D.	Ground 4: Claims 6 and 15 Are Rendered Obvious by the Combination of Waters, Anderson, Teller, and Rajann .....	59
1.	Claim 6 is obvious over Waters, Anderson, Teller, and Rajann .....	59
2.	Claim 15 is obvious over Waters, Anderson, Teller, and Rajann .....	62
X.	CONCLUSION.....	62

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## I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42.100 *et seq.*, K/S HIMPP (“Petitioner”) respectfully requests *inter partes* review of claims 1-20 of U.S. Patent 9,191,756 (EX1001, the “’756 patent”), filed on December 7, 2012 and issued on November 17, 2015, and which is currently assigned to III Holdings 4, LLC (“Patent Owner”). The present Petition should be granted because there is a reasonable likelihood that Petitioner will prevail with respect to at least one of the claims challenged herein. For the reasons detailed in the Petition, Petitioner respectfully requests that claims 1-20 of the ’756 Patent be judged unpatentable and canceled.

The ’756 patent is directed to systems and methods for locating a lost hearing aid. ’756 patent (EX1001) at Abstract, 1:14-15. Hearing aids are small and expensive to replace. *Id.* at 1:32-37.

The ’756 patent recites three main steps for locating a hearing aid: (1) establish a communication channel between a smart phone and a hearing aid (*e.g.*, via a short range wireless protocol such as BLUETOOTH®); (2) monitor the communication channel; and (3) periodically store data related to the location of the smartphone as the hearing aid’s last location while the communication channel is open. *Id.* at 2:3:22, 6:2-17 (claim 1).

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