

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA) Inc.,
Samsung Electronics Co., Ltd., and
Samsung Electronics America, Inc.,

Petitioner

v.

Fundamental Innovation Systems International LLC,
Patent Owner.

PETITION FOR INTER PARTES REVIEW
OF U.S. PATENT NO. 8,624,550 B2

Case No. IPR2018-00110

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EXHIBIT LIST

| Exhibit | Description | Short Name |
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| 1001 | U.S. Patent 8,624,550 | '550 patent |
| 1002 | File History of U.S. Patent 8,624,550 | '550 file history |
| 1003 | U.S. Provisional Application 60/273,021 | '021 provisional |
| 1004 | U.S. Provisional Application 60/330,486 | '486 provisional |
| 1005 | U.S. Patent 7,360,004 | Dougherty |
| 1006 | U.S. Patent 6,625,738 | Shiga |
| 1007 | Universal Serial Bus Specification, Revision 1.1, September 23, 1998 | USB 1.1 |
| 1008 | Universal Serial Bus Specification, Revision 2.0, April 27, 2000 | USB 2.0 |
| 1009 | Declaration of Mr. James Geier in Support of the Petition for Inter Partes Review of U.S. Patent 8,624,550 | Geier |
| 1010 | U.S. Patent 6,625,790 | Casebolt |
| 1011 | Cypress CY7C63722/23 CY7C63742/43 enCoRe™ USB Combination Low-Speed USB & PS/2 Peripheral Controller (Cypress enCoRe or Cypress Datasheet), by Cypress Semiconductor Corporation, published May 25, 2000 | Cypress datasheet |
| 1012 | U.S. Patent 6,531,845 | Kerai |
| 1013 | File History of U.S. Patent No. 7,360,004 | Dougherty file history |

Petitioner, ZTE (USA) Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., requests inter partes review (“IPR”) of claims 1-18 of U.S. Patent No. 8,624,550 B2 (“the ’550 patent”). As explained below, there is a reasonable likelihood that Petitioner will prevail on at least one claim challenged in this petition.

I. Mandatory Notices (37 C.F.R. § 42.8)

A. Real Parties-in-Interest (§ 42.8(B)(1))

ZTE Corporation, ZTE (USA) Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc., are the real parties-in-interest.

B. Related Matters (§ 42.8(B)(2))

The ’550 patent is the subject of Civil Action Nos. 2:17-cv-00145-JRG, 2:16-cv-01424-JRG-RSP, and 2:16-cv-01425-JRG-RSP, which are pending in the U.S. District Court for the Eastern District of Texas, and Civil Action No. 3:17-cv-01827-N, which is pending in the U.S. District Court for the Northern District of Texas.¹ The ’550 patent is also subject to IPR2018-00111, filed by the same Petitioner and pending institution. Petitioner is unaware of any other pending matter that would affect, or be affected by, a decision in this proceeding.

¹ The unpatentability positions herein take into account Patent Owner’s infringement positions in the co-pending litigation and in some instances are based in-part on these positions.

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