# UNITED STATES PATENT AND TRADEMARK OFFICE

# **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

### ZTE (USA) INC., LG ELECTRONICS, INC., LG ELECTRONICS U.S.A. INC., LG ELECTRONICS MOBILECOMM U.S.A. INC., LG ELECTRONICS MOBILE RESEARCH U.S.A. LLC, and LG ELECTRONICS ALABAMA, INC.

Petitioner,

v.

Fundamental Innovation Systems International LLC, Patent Owner.

> Case IPR2018-00111<sup>1</sup> Patent No. 8,624,550

## PATENT OWNER'S RESPONSE

<sup>&</sup>lt;sup>1</sup> LG Electronics, Inc., LG Electronics U.S.A. Inc., LG Electronics Mobilecomm U.S.A. Inc., LG Electronics Mobile Research U.S.A. LLC, and LG Electronics Alabama, Inc. were joined as parties to this proceeding via a Motion for Joinder in IPR2018-00461.

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The Proceeding Should Terminate Because ZTE Has Failed To Name All RPIs			
Improper Expert Conduct During Deposition			
. Ground 1: Claims 1-3, 9-12, and 18 Are Not Rendered Obvious By Rogers			
А.	<ul> <li>Rogers Does Not Disclose Or Render Obvious An Adapter "Configured To Supply Current On The VBUS Line Without Regard To A At Least One Associated Condition Specified In A USB Specification" (Claim 1)</li></ul>		
	USB A. B. C. The A. B. Clain A. B. Clain A. B. The Nam Impu		

IX.

		Least One Associated Condition Specified In A USB Specification"		
	2.	Rogers Does Not Teach Or Make Obvious Supplying Current In Excess Of 500mA		
		a) Rogers Increases Power By Adjusting Voltage And Not Current		
		b) Petitioner Conflates the Current Consumption Internal to the Accessory Shown in Figure 7(b) with Current Supplied at VBUS pin in Figure 7(a)		
		c) The Board Should Disregard Petitioner's New Invalidity Theories		
	3.	Rogers Does Not Teach Or Make Obvious Supply Current In Excess Of 100mA Before Configuration 33		
	4.	Rogers Does Not Teach Or Make Obvious Supplying Current Without Enumeration		
В.	Rogers Does Not Disclose Or Render Obvious An Adapter "Configured To Supply Current On The VBUS Line Without Regard To At Least One USB Specification Imposed Limit" (Claim 10)			
C.	Rogers Does Not Disclose Or Make Obvious Challenged Claims 2 Or 11			
D.	Rogers Does Not Disclose Or Render Obvious The Adapter Of Claims 2 Or 11, "Wherein Said Current Limit Is 500 mA" (Claims 9, 18)			
E.	Rogers Does Not Disclose Or Render Obvious The Adapter Of Claims 1 Or 10, "Wherein Said Current Is Supplied Without USB Enumeration" (Claims 3, 12)			
Ground 2: There Is No Motivation To Implement The Proposed Rogers/Shiga Combination, And Doing So Would Result In An Inoperable System				

А.	Indicate T	SA Would Not Look To Shiga To Find A Way To ate To The Base Unit That A Connected Device Is OC Capable		
	Wo	itioner Provides No Reason Why A POSA ould Have Used SE1 In Response To Standard B Communication		
		1 Signal Disrupts Normal USB Communication ed By Rogers System 51		
	Co	1 Provides No Advantage Over Rogers' USB mmunication Protocol That Already Conveys /DC Configuration		
В.		No Reasonable Expectation Of Success Of SE1 In Rogers		
		or Art Does Not Teach Use Of SE1 Where USB mmunication Is Desired		
	Dis	e Of SE1 in Rogers Requires Ability To tinguish Intentional SE1 Signal From intentional SE1 Error		
	a)	Scenario 1: A POSA Would Believe That Assuming SE1 As Coming From A 48VDC Device Would Electrically Damage Low Voltage Devices And Lead To Errors That Are Difficult To Isolate		
	b)	Scenario 2: A POSA Would Believe That Responding To SE1 In Accordance With The USB Specification Interrupts USB Communication		
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