

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

Case No. IPR2018-00111¹

Patent No. 8,624,550 B2

**PATENT OWNER FUNDAMENTAL INNOVATION SYSTEMS
INTERNATIONAL LLC'S UPDATED NOTICE
PURSUANT TO 37 C.F.R. § 42.8**

¹ 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

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Patent No. 8,624,550

Pursuant to 37 C.F.R. § 42.8, the Patent Owner Fundamental Innovation Systems International LLC hereby submits the following updated notice.

I. Real Party-In-Interest

Fundamental Innovation Systems International LLC is the owner of U.S. Patent No. 8,624,550 (“the '550 patent”), and Fundamental Innovation Systems International Holdings LLC is the parent entity of Fundamental Innovation Systems International LLC. The Patent Owner has contracted JASPAR to manage its patent portfolio.

II. Related Matters

The Patent Owner identifies the following matters that may be deemed related pursuant to 37 C.F.R. § 42.8(b)(2):

- *Fundamental Innovation Systems International LLC v. Samsung Elecs. Co. et al.*, No. 2:17-cv-00145 (E.D. Tex.), settled;
- *Fundamental Innovation Systems International LLC v. LG Electronics, Inc. et al.*, No. 2:16-cv-01425 (E.D. Tex.) (the "LG action");
- *Fundamental Innovation Systems International LLC v. Huawei Investment & Holding Co. et al.*, No. 2:16-cv-01424 (E.D. Tex.), consolidated with the LG action;
- *Fundamental Innovation Systems International LLC v. ZTE Corp. et al.*, No. 3:17-cv-01827 (N.D. Tex.), consolidated with the LG action and stayed pending settlement; and

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- The '550 patent is a continuation application of application No. 13/175,509, now U.S. Patent No. 8,232,766 ("the '766 patent"), which is in turn a continuation of application No. 12/905,934, filed Oct. 15, 2010, now U.S. Patent No. 7,986,127; which is a continuation of 12/714,204, filed Feb. 26, 2010, now U.S. Patent No. 7,834,586 ("the '586 patent"); which is a continuation of 12/268,297, filed Nov. 10, 2008, now U.S. Patent No. 7,737,657; which is a continuation of 11/749,680, filed May 16, 2007, now U.S. Patent No. 7,453,233; which is a continuation of 11/175,885, filed July 6, 2005, now U.S. Patent No. 7,239,111 ("the '111 patent"); which is a continuation of 10/087,629, filed Mar. 1, 2002, now U.S. Patent No. 6,936,936. The '766 claims priority from Provisional Application Nos. 60/330,486, filed Oct. 23, 2001, and 60/273,021, filed Mar. 1, 2001.
- IPR Nos. 2018-00214, 2018-00215, 2018-00472 and 2018-00508 have also been filed against the '766 patent, and the Board has denied institution for all four while ZTE has requested a rehearing in IPR2018-00215;
- IPR Nos. 2018-00274, 2018-00485 and 2018-00493 have been filed against the '586 patent, and the Board has denied institution for all three; and
- IPR Nos. 2018-00276, 2018-00487 and 2018-00495 have been filed against the '111 patent, and the Board has denied institution for IPR2018-00487 and 2018-00495. IPR2018-00276 is pending.

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- IPR Nos. 2018-00110, 2018-00111, 2018-00460, 2018-00461 and 2018-00465 have been filed against the '550 patent, and the Board has denied institution for IPR2018-00110, IPR2018-00460, IPR2018-00465, and terminated and consolidated IPR2018-00461 with IPR2018-00111.

III. Lead And Back-Up Counsel

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IV. Service Information

The Patent Owner consents to electronic service by email to email addresses listed above and FundamentalIPRs@irell.com.

Dated: September 13, 2018

Respectfully submitted,

By: /s/ Hong Zhong
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CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. section § 42.6, that on September 13, 2018, a complete copy of the foregoing document was served upon the following, by ELECTRONIC MAIL:

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