

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.,

Petitioners,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,

Patent Owner.

Case No. IPR2018-00276
Patent No. 7,239,111

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

IPR2018-00276
Patent No. 7,239,111

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

I. Real Party-In-Interest

Fundamental Innovation Systems International LLC is the owner of U.S. Patent No. 7,239,111 (“the '111 patent”), and Fundamental Innovation Systems International Holdings LLC is the parent entity of Fundamental Innovation Systems International LLC. The Patent Owner has contracted with TnT IP, LLC 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.);
- *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; and,
- *Fundamental Innovation Systems International LLC v. ZTE Corp. et al.*, No. 3:17-cv-01827 (N.D. Tex.).

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- The '111 patent is a continuation application of U.S. Application No. 10/087,629, filed Mar. 1, 2002, now U.S. Patent No. 6,936,936; which claims priority from U.S. Provisional Application Nos. 60/330,486, filed Oct. 23, 2001, and 60/273,021, filed Mar. 1, 2001.
- The '111 patent has seven children applications:
 - U.S. Application No. 11/749,680, filed on May 16, 2007, now U.S. Patent No. 7,453,233;
 - U.S. Application No. 12/268,297, filed on Nov. 10, 2008, now U.S. Patent No. 7,737,657;
 - U.S. Application No. 12/714,204, filed Feb. 26, 2010, now U.S. Patent No. 7,834,586 ("the '586 patent");
 - U.S. Application No. 12/905,934, filed Oct. 15, 2010, now U.S. Patent No. 7,986,127;
 - U.S. Application No. 13/175,487, filed on Jul. 1, 2011, now U.S. Patent No. 8,169,187;
 - U.S. Application No. 13/175,509, filed Jul. 1, 2011, now U.S. Patent No. 8,232,766 ("the '766 patent"); and,
 - U.S. Application No. 13/536,767, filed on Jun. 28, 2012, now U.S. Patent No. 8,624,550 ("the '550 patent").

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- IPR Nos. 2018-00605, 2018-00606 and 2018-00607 have been filed against the '936 patent;
- IPR Nos. 2018-00487 and 2018-00495 have also been filed against the '111 patent;
- IPR Nos. 2018-00485, 2018-00493 and 2018-00274 have been filed against the '586 patent;
- IPR Nos. 2018-00214, 2018-00215, 2018-00472 and 2018-00508 have also been filed against the '766 patent;
- IPR Nos. 2018-0110, 2018-00111, 2018-00460, 2018-00461 and 2018-00465 have been filed against the '550 patent.

III. Lead And Back-Up Counsel

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