

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,
Patent Owner.

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

**FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC's
PATENT OWNER PRELIMINARY RESPONSE**

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