

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
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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