

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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HUAWEI DEVICE CO., LTD.

Petitioner,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,

Patent Owner.

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Case No. IPR2018-00485

Patent No. 7,834,586

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

IPR2018-00485  
Patent No. 7,834,586

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. 7,834,586 (“the '586 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 '586 patent is a continuation application of U.S. Application No. 12/268,297, filed Nov. 10, 2008, now U.S. Patent No. 7,734,657; which is a continuation application 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 application of 10/087,629, filed Mar. 1, 2002, now U.S. Patent No. 6,936,936. The '586 patent claims priority from U.S. Provisional Applications 60/330,486, filed Oct. 23, 2001, and 60/273/021, filed Mar. 1, 2001.
- The '586 patent has four children applications:
  - 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 July 1, 2011, now U.S. Patent No. 8,169,187;
  - U.S. Application No. 13/175,509, filed on July 1, 2011, now U.S. Patent No. 8,232,766 ("the '766 patent); and,
  - U.S. Application No. 13/536,767, filed on June 28, 2012, now U.S. Patent No. 8,624,550 ("the '550 patent).

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- IPR No. 2018-00493 has also been filed against the '586 patent;
- IPR Nos. 2018-00487 and 2018-00495 have been filed against the '111 patent.
- IPR Nos. 2018-00214, 2018-00215, 2018-00472 and 2018-00508 have been filed against the '766 patent; and,
- 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

Lead Counsel	Back-up Counsel
Hong Annita Zhong (Reg. No. 66,530) IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067 Telephone: (310) 277-1010 Facsimile: (310) 203-7199 <a href="mailto:hzhong@irell.com">hzhong@irell.com</a>	Michael Fleming (Reg. No. 67,933) Jason Sheasby ( <i>pro hac vice</i> to be requested) James Milkey ( <i>pro hac vice</i> to be requested) IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067 Telephone: (310) 277-1010 Facsimile: (310) 203-7199 <a href="mailto:mflaming@irell.com">mflaming@irell.com</a> <a href="mailto:jsheasby@irell.com">jsheasby@irell.com</a> <a href="mailto:jmilkey@irell.com">jmilkey@irell.com</a>

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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](mailto:FundamentalIPRs@irell.com).

Dated: January 22, 2018

Respectfully submitted,  
By:           /s/ Hong Zhong            
H. Annita Zhong. (Reg. No. 66,530)

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