Paper No.	

### UNITED STATES PATENT AND TRADEMARK OFFICE

\_\_\_\_\_

### BEFORE THE PATENT TRIAL AND APPEAL BOARD

\_\_\_\_\_

Google LLC

Petitioner

v.

Cywee Group Ltd.

(record) Patent Owner

IPR2018-01257 Patent No. 8,552,978

PETITION FOR INTER PARTES REVIEW UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §42.100 ET. SEQ



# TABLE OF CONTENTS

TAB	LE OF	EXHIBITS	4
NOT	ICE O	F LEAD AND BACKUP COUNSEL	5
NOT	ICE O	F THE REAL-PARTIES-IN-INTEREST	5
NOT	ICE O	F RELATED MATTERS	5
NOT	ICE O	F SERVICE INFORMATION	6
GRO	UNDS	FOR STANDING	6
STA	ГЕМЕ	NT OF PRECISE RELIEF REQUESTED	7
THR	ESHO]	LD REQUIREMENT FOR INTER PARTES REVIEW	7
I.	INTR	ODUCTION	7
	A.	Prosecution History and Issued Claims	11
II.	CLAI	M CONSTRUCTION	14
	A.	Claim 10—"spatial reference frame"	14
	B.	Claim 10—"rotation output"	18
GRO	UNDS		18
Ground 1.		Claims 10 and 12 are obvious over Zhang in view of Bachmann	18
		Overview of the Combination	19
		Rationale for the Combination	30
		Ability to Implement and Reasonable Expectation of Success	37
		Graham Factors	39
		Claim Mapping	39
Grou	nd 2.	Claims 10 and 12 are unpatentable over Liberty in view of Bachma	nn. 60

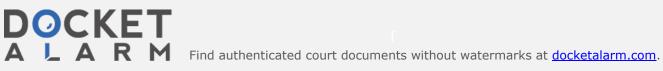


Overview of the Combination	61
Rationale for the Combination	68
Ability to Implement and Reasonable Expectation of Success	74
Difference Between the Combination and Prior Discussion of Liberty	76
Graham Factors	76
Claim Mapping	77
CERTIFICATE OF SERVICE	84
CERTIFICATE OF WORD COUNT	85



# **TABLE OF EXHIBITS**

Exhibit No.	Description
1001	U.S. Pat. No. 8,552,978 ("the '978 patent").
1002	Declaration of Professor Majid Sarrafzadeh.
1003	C.V. of Professor Majid Sarrafzadeh.
1004	U.S. Pat. No. 7,089,148 (" <b>Bachmann</b> ").
1005	U.S. Pat. App. Pub. 2004/0095317 (" <b>Zhang</b> ").
1006	U.S. Pat. 7,158,118 ("Liberty").
1007	Return of Service for <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571, (D. Del.).
1008	Return of Service for <i>Cywee Group Ltd. v. Huawei Technologies Co., Inc. et al.</i> , Case No. 2-17-cv-00495, (E.D. Tex.).
1009	File History of U.S. Pat. App. 13/176,771.
1010	Joint Claim Construction and Prehearing Statement in <i>Cywee Group Ltd. v. Samsung Electronics Co. Ltd. et al.</i> , Case No. 2-17-cv-00140, (E.D. Tex.).
1011	Exhibit E (Claim chart with of U.S. Pat. No. 8,552,978) to CyWee's Complaint in <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571, (D. Del.)



Petitioner respectfully requests *inter partes* review under 35 U.S.C. §311 of claims 10 and 12 of U.S. Pat. No. 8,552,978 ("the '978 patent").

### NOTICE OF LEAD AND BACKUP COUNSEL

Lead Counsel: Matthew A. Smith (Reg. No. 49,003); Tel: 202.669.6207

Backup Counsel: Andrew S. Baluch (Reg. No. 57,503); Tel: 847.863.1645

Backup Counsel: Christopher M. Colice (Reg. No. 65,634); Tel:

617.947.7280.

Address of lead counsel: Smith Baluch LLP, 1100 Alma St., Ste 109, Menlo Park, CA 94025.

### NOTICE OF THE REAL-PARTIES-IN-INTEREST

The real-parties-in-interest for this petition are Google LLC and Huawei Device USA, Inc., Huawei Device Co. Ltd., Huawei Technologies Co. Ltd., Huawei Device (Dongguan) Co. Ltd., Huawei Investment & Holding Co. Ltd., Huawei Tech. Investment Co. Ltd., Huawei Device (Hong Kong) Co. Ltd.

### NOTICE OF RELATED MATTERS

The '978 patent is asserted in the following matters:

- Cywee Group Ltd. v. Google, Inc., Case No. 1-18-cv-00571, (D. Del.);
- Cywee Group Ltd. v. ZTE Corporation et al., Case No. 3-17-cv-02130,
  (S.D. Cal.);
- Cywee Group Ltd. v. HTC Corporation et al., Case No. 2-17-cv-00932,



# DOCKET

# Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

# **Real-Time Litigation Alerts**



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

# **Advanced Docket Research**



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## **Analytics At Your Fingertips**



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

### API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

#### **LAW FIRMS**

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

#### **FINANCIAL INSTITUTIONS**

Litigation and bankruptcy checks for companies and debtors.

### **E-DISCOVERY AND LEGAL VENDORS**

Sync your system to PACER to automate legal marketing.

