

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, ZTE (USA), INC., SAMSUNG ELECTRONICS CO., LTD.,
LG ELECTRONICS INC., 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., and
HUAWEI DEVICE (HONG KONG) CO. LTD.,
Petitioner

v.

CYWEE GROUP LTD.
Patent Owner

Case IPR2018-01257
Patent No. 8,552,978

**PATENT OWNER'S SUR-REPLY IN SUPPORT OF PATENT OWNER
RESPONSE**

TABLE OF CONTENTS

I. BACHMANN IS NOT ANALGOUS ART 1

**II. THE ASSERTED COMBINATION OF REFERENCES DO NOT
RENDER THE CHALLENGED CLAIMS OBVIOUS 2**

**A. A PHOSITA Would Not Be Motivated to Combine *Zhang* or *Liberty*
with *Bachmann* 2**

B. The Combinations Do Not Disclose All Elements of Claim 1 4

**i. *Zhang* in view of *Bachmann* does not disclose element “a 3D pointing
device” 4**

**ii. Neither *Zhang* in View of *Bachmann* nor *Liberty* in View or *Bachmann*
discloses “obtaining one or more resultant deviation including a plurality
of deviation angles using a plurality of measured magnetisms M_x , M_y , M_z
and a plurality of predicted magnetism M_x' , M_y' , M_z' for the second
signal set” 5**

C. Secondary Indicia of Non-Obviousness..... 6

III. CONCLUSION..... 7

TABLE OF AUTHORITIES

Cases

Ecolochem, Inc. v. Southern California Edison Co.,
227 F.3d 1361 (Fed. Cir. 2000)..... 2, 3

LIST OF EXHIBITS

2001	Declaration of Dr. Gary L. Blank [WITHDRAWN]
2002	<i>Curriculum Vitae</i> of Dr. Gary L. Blank CV [WITHDRAWN]
2003	Claim Construction Opinion and Order (Doc. 117), <i>Cywee Group Ltd. v. Samsung Elecs. Co., Ltd.</i> , C.A. No. 2:17-CV-00140-WCB-RSP (E.D. Tex., July 9, 2018)
2004	Expert Declaration of Dr. Joseph LaViola, Ph.D., in Support of Patent Owner Response
2005	<i>Curriculum Vitae</i> of Dr. Joseph LaViola, Ph.D.
2006	Order (Doc. 153), <i>Cywee Group Ltd. v. Samsung Elecs. Co., Ltd.</i> , C.A. No. 2:17-CV-00140-WCB-RSP (E.D. Tex., Aug. 14, 2018)
2007	Memorandum Opinion (Doc. 55), <i>CyWee Group Ltd. v. Motorola Mobility LLC</i> , C.A. No. 17-780-RGA (D. Del., Dec. 21, 2018)
2008	File History of U.S. Application No. 10/396,439
2009	File History of U.S. Application No. 12/413,722
2010	File History of U.S. Application No. 13/367,058
2011	Expert Declaration of Dr. Joseph LaViola, Ph.D., in Support of Motion to Amend
2012	File History of U.S. Provisional Application 61/292,558
2013	Google's Responses to CyWee's Requests for Production, <i>CyWee Group Ltd. v. Google, Inc.</i> , No. 1:18-cv-00571 (D. Del.) (Sep. 4, 2018)

2014	Google/Samsung 2011-2012 Mobile Application Distribution Agreement (Android)
2015	<i>CyWee Group, Ltd. v. Samsung Elecs. Co. Ltd.</i> , C.A. No. 2:17-CV-00140-WCB-RSP, Doc. 1-1 (Exhibit A, Infringement Claim Chart)
2016	Web Print-Out “ <i>Introducing PAX: the Android Networked Cross-License Agreement</i> ,” available at https://blog.google/outreach-initiatives/public-policy/introducing-pax-android-networked-cross-license-agreement/
2017	List of IPR Petitions Filed against Seven Networks, LLC
2018	Demonstrative: Relationship of Android Defendants
2019	Transcript of Call Authorizing Patent Owner to File Motion to Terminate (July 8, 2019)
2020	Declaration of Shun-nan Liou
2021	CyWee, Where Technology Entertains 2009.09
2022	JIL Game System Hardware Specification Ver. 1.5
2023	JIL Phone Bill of Materials (May 24, 2010)
2024	Photographs of JIL Phone Prototype
2025	CyWee Phone API Reference
2026	CyWee Motion Fusion Solution
2027	CyWee Where technology entertains Technical Presentation: Motion Technology and Gaming Applications

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.