

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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

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

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**PATENT OWNER'S REPLY IN SUPPORT OF MOTION TO AMEND**

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**TABLE OF AUTHORITIES**

**Cases**

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*Purdue Pharma. L.P. v. Boehringer Ingelheim GmbH*,  
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**Statutes**

35 U.S.C. § 102 (Pre-AIA) ..... 1, 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 Gary L. Blank [WITHDRAWN]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 Gary L. Blank CV [WITHDRAWN]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 <a href="https://blog.google/outreach-initiatives/public-policy/introducing-pax-android-networked-cross-license-agreement/">https://blog.google/outreach-initiatives/public-policy/introducing-pax-android-networked-cross-license-agreement/</a>
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

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