

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.
(record) Patent Owner

IPR2018-01257

Patent No. 8,552,978

**PETITIONER'S OPPOSITION TO
PATENT OWNER'S MOTION TO TERMINATE**

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Ventex Co. v. Columbia Sportswear N. Am., IPR2017-00651, Paper 152 (PTAB Jan. 24, 2019) (precedential) 6, 11, 14

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77 Fed. Reg. 48,612 (Aug. 14, 2012)..... 1

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TABLE OF EXHIBITS

Exhibit No.	Description
1001	U.S. Pat. No. 8,441,438 (“ the ’438 patent ”).
1002	Declaration of Professor Majid Sarrafzadeh.
1003	C.V. of Professor Majid Sarrafzadeh.
1004	U.S. Pat. No. 7,089,148 (“ Bachman ”).
1005	U.S. Pat. App. Pub. 2004/0095317 (“ Zhang ”).
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	Ex. D to Complaint of April 16, 2018 in <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571 (D. Del.).
1012	Email of August 3, 2018 from Michael Shore to Luann Simmons.
1013	CyWee’s First Requests for Production of Documents in <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571, (D. Del.).
1014	CyWee’s Opposition to Petitioner’s Motion for Joinder to Inter Partes Review IPR2018-01258 of February 8, 2019.
1015	CyWee’s Opp. to Defendants’ Motion to Stay Pending Inter Partes Review Proceedings in <i>CyWee Group, Ltd. v. Samsung</i>

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	<i>Elec. Co., Ltd.</i> , Case 2:17-cv-00140-WCB-RSP (E.D. Tex. Jan. 25, 2019).
1016	Complaint of April 16, 2018 in <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571 (D. Del.).
1017	U.S. Pat. Pub. No. US 2010/0312468 A1 (“ Withanawasam ”).
1018	Rebuttal Declaration of Professor Majid Sarrafzadeh
1019	Deposition Transcript of Dr. Joseph LaViola in IPR2018-01257, -01258 (May 22, 2019)(“ LaViola Tr. ”).
1020	U.S. Pat. No. 7,356,361 (“ Hawkins ”).
1021	U.S. Pat. No. 7,630,741 (“ Siddiqui ”).
1022	U.S. Pat. No. 8,738,103 (“ Puente Baliarda ”)
1023	USPTO PATFT database search results (search string “ref/7089148”).
1024	U.S. Pat. Pub. 2018/0153587 A1 (“ van der Walt ”).
1025	Deposition Transcript of Joseph LaViola in <i>CyWee Group Ltd., v. Huawei Device Co. Ltd.</i> , CASE NO. 2017-cv-00495-WCB-RSP (E.D. Tex. September 25, 2018).
1026	Complaint, <i>CyWee Group Ltd., v. Google, Inc.</i> 1:18-cv-00571 (D. Del. Apr. 16, 2018).
1027	First Amended Complaint, <i>CyWee Group Ltd. v. LG Electronics, Inc.</i> , 3:17-cv- 01102 (S.D. Cal. Oct. 6, 2017).
1028	First Amended Complaint, <i>CyWee Group Ltd. v. Samsung Electronics Co., Ltd.</i> , 2:17-cv-00140 (E.D. Tex. Mar. 3, 2017).
1029	Complaint, <i>CyWee Group Ltd. v. ZTE Corp.</i> , 3:17-cv-02130 (S.D. Cal. Oct. 17, 2017)
1030	<i>About the Android Open Source Project</i> , https://source.android.com

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