

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.

(record) Patent Owner

IPR2018-01257

Patent No. 8,552,978

**PETITIONER GOOGLE'S SUR-REPLY IN OPPOSITION TO
MOTION TO AMEND**

TABLE OF CONTENTS

I. CYWEE HAS NOT PROVEN PRIOR INVENTION..... 1

 A. There is no Competent Evidence of Conception, Diligence or
 Reduction to Practice..... 1

 B. There is no Corroboration of Conception 1

 C. There is no Corroboration of Diligence 3

 D. There is no Corroboration of an Actual Reduction to Practice..... 4

II. WITHANAWASAM AND BACHMANN RENDER THE PROPOSED
AMENDED CLAIMS OBVIOUS 6

 A. There was Ample Motivation to Combine..... 6

 B. The Combination Discloses a 3D-Pointing Device 8

 C. The Combination Discloses Proposed Element 19(g) 10

 D. The Combination Discloses Element 19(h) 10

CERTIFICATE OF SERVICE 13

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 (“ 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>

	<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

1031	<i>Android Is For Everyone, Enabling Opportunity</i> , available at https://www.android.com/everyone/enabling-opportunity/
1032	<i>Android Is For Everyone, Facts</i> available at https://www.android.com/everyone/facts/
1033	<i>Official Blog, Hiroshi Lockheimer April 15, 2015</i> , available at https://googleblog.blogspot.com/2015/04/android-has-helped-create-more-choice.html
1034	Memorandum Opinion and Order (Dkt. #250), <i>CyWee v. Samsung</i> , 2:17-cv-00140 (E.D. Tex. Nov. 7, 2018)
1035	PAXLICENSE.ORG, available at https://paxlicense.org/index.html
1036	PhoneArena.com, Phone Manufacturers, available at www.phonearena.com/phones/manufacturers
1037	PhoneArena.com, Google Pixel Rivals and Competitors, available at https://www.phonearena.com/phones/Google-Pixel-2_id10584/rivals
1038	Declaration of Collin W. Park
1039	Screenshot of Adobe Acrobat Creation and Modified Date Properties for Exhibit 2021.
1040	Search results from European Patent Office Web site (https://worldwide.espacenet.com) for applicant CyWee, in order of ascending priority date.
1041	Search results from U.S.P.T.O. Web site assignee database for assignee CyWee.
1042	U.S. Pat. No. 8,041,860.
1043	[SEALED] Second Deposition Transcript of Dr. Joseph LaViola in IPR2018-01257, -01258 (August 13, 2019)(“ 2nd LaViola Tr. ”).
1044	Third Declaration of Majid Sarrafzadeh

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