

Filed: November 22, 2019

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 RESPONSE TO PETITIONER GOOGLE'S MOTION  
TO SEAL**

**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 Gary L. Blank [WITHDRAWN]  |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 Gary L. Blank CV [WITHDRAWN]   |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   |

|      |   |
|------|---|
| 2028 | July 29, 2009 email to James Shen, Qualcomm   |
| 2029 | Attachment to July 29, 2009 email to James Shen, Qualcomm   |
| 2030 | CyWee/Qualcomm Mutual NDA (April 23, 2008)  |
| 2031 | Attitude.cpp file (last modified February 12, 2010)   |
| 2032 | Expert Declaration of Dr. Joseph LaViola, Ph.D., in Support of Patent Owner's Reply in Support of Motion to Amend   |
| 2033 | Transcript of Deposition of Prof. Majid Sarrafzadeh (July 24, 2019)   |
| 2034 | Attitude.cpp file, with Line Numbers (last modified February 12, 2010)  |
| 2035 | Amended Notice of Deposition of Collin W. Park (previously filed as Paper 62)   |
| 2036 | Complaint for Patent Infringement, <i>CyWee Group Ltd., v. Samsung Elec. Co., Ltd., et al.</i> , C.A. No. 2;17-cv-00140-WCB-RSP, Dkt. 1 (filed Feb. 17, 2017) |
| 2037 | Petition, <i>LG Elec. Inc. v. CyWee Group Ltd.</i> , IPR2019-00559, Paper 1 (Jan. 10, 2019)   |
| 2038 | Petition, <i>LG Elec. Inc. v. CyWee Group Ltd.</i> , IPR2019-00560, Paper 1 (Jan. 10, 2019)   |
| 2039 | Petition, <i>LG Elec. Inc. v. CyWee Group Ltd.</i> , IPR2019-01203, Paper 1 (June 15, 2019)   |

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|------|--|
| 2040 | Web Print-Out “ <i>Introducing PAX: the Android Networked Cross-License Agreement</i> ,” available at < <a href="https://blog.google/outreach-initiatives/publicpolicy/introducing-pax-android-networked-cross-licenseagreement/">https://blog.google/outreach-initiatives/publicpolicy/introducing-pax-android-networked-cross-licenseagreement/</a> ><br>(previously filed as Ex. 2016)  |
| 2041 | Declaration of Collin W. Park<br>(previously filed as Ex. 1038)  |
| 2042 | Web Print-Out, Morgan Lewis, Lawflash Article “ <i>Statutory Time Bar Applies to Privity and RPI Relationships Arising After Filing of IPR Petition</i> ,” (June 27, 2019), available at < <a href="https://www.morganlewis.com/pubs/statutory-time-barapplies-to-privity-rpi-relationships-arising-after-ipr-petitionfiling">https://www.morganlewis.com/pubs/statutory-time-barapplies-to-privity-rpi-relationships-arising-after-ipr-petitionfiling</a> > |
| 2043 | CyWee Litigation Timeline  |
| 2044 | <i>CyWee Group, Ltd. v. LG Elecs., Inc., et al.</i> , Exemplary Claim Chart  |
| 2045 | Transcript of Deposition of Collin W. Park (August 21, 2019)   |
| 2046 | Google U.S. Trademark Reg. No. 4,692,657, Statement of Use (filed December 2, 2014)  |
| 2047 | Aug. 16-20, 2019, Correspondence between C. Key and M. Smith   |
| 2048 | LG Electronics, Inc. Filings for ZNFG011C (Google Pixel 2 XL), External Photographs (submitted Sep. 11, 2017)  |
| 2049 |  , ZTE-IPR 000001-12   |

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