

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 OBJECTION AND MOTION TO TERMINATE
PROCEEDINGS UNDER UNITED STATES CONSTITUTION ARTICLE
II, SECTION 2, CLAUSE 2**

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 Gary L. Blank [WITHDRAWN]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 Gary L. Blank CV [WITHDRAWN]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
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)
2040	Web Print-Out " <i>Introducing PAX: the Android Networked Cross-License Agreement</i> ," available at https://blog.google/outreach-initiatives/publicpolicy/introducing-pax-android-networked-cross-licenseagreement/ (previously filed as Ex. 2016)

2041	Declaration of Collin W. Park (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 < https://www.morganlewis.com/pubs/statutory-time-barapplies-to-privity-rpi-relationships-arising-after-ipr-petitionfiling >
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	REDACTED , ZTE-IPR 000001-12
2050	REDACTED , ZTE-IPR 000013-17
2051	REDACTED , ZTE-IPR 000020-35
2052	REDACTED , ZTE-IPR 000039-43

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