## **Demonstratives of Petitioner Samsung Electronics Co., Ltd.**

Inter Partes Review of U.S. Patent No. 5,699,275

IPR2018-01552 IPR2018-01553

Oral Hearing: November 4, 2019

SAMSUNG EXHII

Samsung Electronics Co., Ltd. v. Iron Oak Technolog



# **Instituted Grounds**

# • IPR2018-01552:

- o Claim 1 as anticipated by Sugita
- o Claim 1 as obvious over Sugita and Wortham
- o Claim 1 as obvious over Ballard and Shimizu

## • IPR2018-01553:

- o Claim 1 as obvious over *Hapka* and *Parrillo*
- o Claim 1 as obvious over *Hapka*, *Parrillo*, and *Wortham*



## The '275 Patent: Claim 1

- 1. A system for remote patching of operating code located in a mobile unit, comprising:
  - a manager host operable to initiate transmission through a wireless communication network of at least one discrete patch message defining at least one patch;
  - a first mobile unit operable to receive the at least one discrete patch message, the first mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the first mobile unit and to switch execution to the patched operating code; and
  - a second mobile unit operable to receive the at least one discrete patch message, the second mobile unit further operable to create patched operating code by merging the at least one patch with current operating code located in the second mobile unit and to switch execution to the patched operating code; and
  - wherein the manager host is further operable to address the at least one discrete patch message such that the at least one discrete patch message is transmitted to the first mobile unit but not to the second mobile unit.



## The '275 Patent: Claim 14

14. The system of claim 1, wherein the manager host is further operable to address the at least one discrete patch message such that the at least one discrete patch message is transmitted to the first mobile unit and to the second mobile unit.



## **Claim Construction**

## Petitioner's Proposed Constructions:

- o "mobile unit"
- o "operating code"
- o "[manager host operable to] initiate transmission [through a wirele communication network of at least one discrete patch message def at least one patch]"
- o "merging the at least one patch with current operating code"
- "[manager host is further operable to] address [the at least one disc patch message]"



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