

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Panasonic Corporation of North America *et al.*

Petitioners

v.

Cellspin Soft, Inc.

Patent Owner

CASE: IPR2019-00131

Patent No. 9,258,698

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

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I. INTRODUCTION

The three prior art references here (Mashita, Onishi, Hiraishi) each expressly disclose a Bluetooth connection between a phone and camera. Cellspin argues that these references nonetheless do not disclose implementing these connections as *paired* Bluetooth connections. But Mashita does disclose a paired Bluetooth connection. It describes the same pairing process as the '698 patent itself. And the Bluetooth specification documents describe the process of pairing the same way as Mashita does—entering the same PIN on both devices.

Beyond that, Cellspin never explains how pairing could possibly be a non-obvious implementation of Bluetooth. The facts are these: Bluetooth was in hundreds of millions of devices at the time of the alleged inventions—“pervasive” to use the '698 patent’s word (*see* Ex. 1003 (“’698 patent”), 9:42-45). All Bluetooth devices could implement a paired connection. The *only two options* for implementing Bluetooth connections were paired or not. Cellspin’s expert witness, Dr. Foley, agreed that a POSITA would have known how to implement paired connections and would have understood the many benefits of doing so. Indeed, the very Bluetooth specification document that Cellspin identifies as describing “the scenarios most in line with the '698 patent” (Paper 19 (“Response”), 37-38) explicitly teaches that whether to use a paired connection or not is merely “left to

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