UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PANASONIC CORPORATION OF NORTH AMERICA *ET AL.*
Petitioners,

vs.

CELLSPIN SOFT, INC.,
Patent Owner

CASE: PR2019-00131
Patent No. 9,258,698

PATENT OWNER'S SUR-REPLY TO PETITIONER'S REPLY

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I. INTRODUCTION

Panasonic's Reply brazenly attempts to assert improper new theories, evidence and other matters in what should be a reply. This Sur-Reply is subject to, and without waiving, Cellspin's objections at Doc 25.

Panasonic at least tacitly admits that neither Onishi nor Hiraishi disclose a paired Bluetooth connection. Panasonic's erroneous assertion that Mashita discloses a paired connection relies upon improper new theories and assertions, but it is nonetheless groundless.

Panasonic's erroneous new theory of Bluetooth/pairing obviousness is improper. Irrespective, **Panasonic fails to cite prior disclosure of a device that has performed any claimed method or a device that would be capable of the claimed functions**. Panasonic's assumption that all "Bluetooth" devices are capable of performing *every* function described in the Bluetooth specification is incorrect.Ex.2026,¶18.

Panasonic fails to show to show teachings to render obvious at least:

(1) a paired wireless connection between a camera and mobile device;

(2) cryptographic authentication of the mobile device by the camera;

(3) none of the proposed combinations disclose limitation G;

(4) using HTTP to upload received files and additional data, e.g., Mashita teaches away from a cellular phone using HTTP;

(5) combining Mashita with Hirashi would not work;

(6) GUI's in general and specifically not for image deletion on the wirelessly connected camera; and

(7) for claims 5 and 8, a single mobile application performing all the required functions.

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