

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.
Petitioner

v.

UUSI, LLC dba NARTRON
Patent Owner

Case IPR2019-00356
Patent No. 5,796,183

PATENT OWNER'S PRELIMINARY RESPONSE

EXHIBITS

EX. #	Exhibit Description
UUSI-2001	Declaration of Lawrence M. Hadley in support of patent owner's motion for <i>pro hac vice</i> admission
UUSI-2002	Declaration of Dr. Darran Cairns in support of patent owner preliminary response
UUSI-2003	Declaration of David W. Caldwell in support of patent owner preliminary response

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. BACKGROUND	3
A. The Invention of the '183 Patent.....	3
B. The Asserted Prior Art References.....	7
1. Caldwell '205	7
2. Ingraham '735	11
3. Tucker	12
4. Redmayne.....	13
5. Schwarzbach	13
6. Ingraham '548	14
7. Meadows	15
III. THE BOARD SHOULD EXERCISE ITS DISCRETION TO DENY THE PETITION BASED ON SAMSUNG'S RECENT, UNSUCCESSFUL IPR CHALLENGING THE SAME CLAIMS	16
IV. PETITIONER'S PROPOSED CLAIM CONSTRUCTION SHOULD NOT BE ADOPTED	24
A. Claim Construction Standard	24
B. Apple's Proposed Construction of "providing signal output frequencies" Is Legally Wrong and Conflicts with the Board's Prior Decision.....	25
V. THE PETITION SHOULD NOT BE INSTITUTED ON ANY GROUND	29
A. [All Grounds]—None of the Asserted References Disclose a "Microcontroller" that "Selectively" Provides "Signal Output Frequencies" as Required in Each Challenged Claim	29
1. Caldwell Does Not Disclose Selectively Providing "Signal Output Frequencies"	29
2. Caldwell's "Microcomputer" Does Not Provide any "Frequencies"	33
B. [All Grounds]—Apple Fails to Offer a Motivation to Combine Caldwell with Ingraham	36
1. Legal Standard	36
2. Apple Offers No Reason Why One of Skill In The Art Would Have Been Motivated to Modify Caldwell's Cooktop Key Pad With Ingraham's Closely-Spaced, More Sensitive Touch Plate, to Obtain the Claimed Invention	37
C. [All Grounds]—Apple Fails to Provide Substantial Evidence	

that the Proposed Caldwell-Ingraham Combination Would Work to Solve the Problem Addressed in the '183 Patent.....	40
1. Legal Standard	40
2. Substituting Ingraham's Touch Plate for Caldwell's Touch Pads as Apple Proposes Would Not Work to Achieve the Challenged Claims.....	41
D. [Ground 1B]---Claim 28 Is Not Obvious Over Caldwell Combined with Ingraham and Tucker.....	49
E. [Ground 1C]---Claims 83-85 and 93 Are Not Obvious Over Caldwell Combined with Ingraham and Redmayne	49
F. [Ground 1D]---Claim 90 Is Not Obvious Over Caldwell Combined with Ingraham, Redmayne, and Schwarzbach	50
G. [Ground 1E]---Claim 91 Is Not Obvious Over Caldwell Combined with Ingraham, Redmayne, and Ingraham '548	50
H. [Ground 1F]—Claims 86-88 Are Not Obvious Over Caldwell Combined with Ingraham, Redmayne, and Meadows	50
I. [Ground 1G]—Claim 92 Is Not Obvious Over Caldwell Combined with Ingraham, Redmayne, and Tucker	53
VI. CONCLUSION.....	53

I. INTRODUCTION

U.S. Patent No. 5,796,183 (“’183 Patent”) addresses the problem of unintended actuation in densely-spaced, capacitive responsive electronic switching circuit arrays on touch-operated devices. Ex 1001, 3:64-4:3. This is Apple’s second of six separate petitions for *Inter Partes* Review (“IPR”) challenging the ’183 patent on obviousness grounds. In this IPR, Apple challenges one independent claim (83) and a number of dependent claims on several grounds: (i) Caldwell ’205 in combination with Ingraham ’735 (claims 32 and 36); (ii) Caldwell ’205 in combination with Ingraham ’735 in combination with Tucker (claim 28); (iii) Caldwell ’205 in combination with Ingraham ’735 in combination with Redmayne (claims 83-85, and 93); (iv) Caldwell ’205 in combination with Ingraham ’735 in combination with Redmayne in combination with Schwarzbach (claim 90); (v) Caldwell ’205 in combination with Ingraham ’735 in combination with Redmayne in combination with Ingraham ’548 (claim 91); (vi) Caldwell ’205 in combination with Ingraham ’735 in combination with Redmayne in combination with Meadows (claims 86-88); and, (vii) Caldwell ’205 in combination with Ingraham ’735 in combination with Redmayne in combination with Tucker (claim 92).

The ’183 Patent has been reexamined twice. More recently, all of the challenged claims were the subject of a recently-concluded IPR in which the

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