

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA), Inc.

Petitioner

v.

Cywee Group Ltd.

(record) Patent Owner

IPR2019-00525

Patent No. 8,552,978

**PETITION FOR INTER PARTES REVIEW
UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §42.100 ET. SEQ**

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TABLE OF EXHIBITS

Exhibit No.	Description
1001	U.S. Pat. No. 8,552,978 (“ the ’978 patent ”).
1002	Declaration of Professor Majid Sarrafzadeh.
1003	C.V. of Professor Majid Sarrafzadeh.
1004	U.S. Pat. No. 7,089,148 (“ Bachmann ”).
1005	U.S. Pat. App. Pub. 2004/0095317 (“ Zhang ”).
1006	U.S. Pat. 7,158,118 (“ Liberty ”).
1007	Return of Service for <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571, (D. Del.).
1008	Return of Service for <i>Cywee Group Ltd. v. Huawei Technologies Co., Inc. et al.</i> , Case No. 2-17-cv-00495, (E.D. Tex.).
1009	File History of U.S. Pat. App. 13/176,771.
1010	Joint Claim Construction and Prehearing Statement in <i>Cywee Group Ltd. v. Samsung Electronics Co. Ltd. et al.</i> , Case No. 2-17-cv-00140, (E.D. Tex.).
1011	Exhibit E (Claim chart with of U.S. Pat. No. 8,552,978) to CyWee’s Complaint in <i>Cywee Group Ltd. v. Google, Inc.</i> , Case No. 1-18-cv-00571, (D. Del.)
1012-1049	Reserved
1050	Comparison between the Current Petition and Petition in IPR2018-01257
1051	Claim Construction Order, <i>Cywee Group Ltd. v. Motorola Mobility LLC</i> , 17-cv-00780, Jan. 4, 2019
1052	Declaration of Andrea Shoffstall

Petitioner ZTE (USA), Inc. (“Petitioner” or “ZTE”) respectfully requests *inter partes* review under 35 U.S.C. §311 of claims 10 and 12 of U.S. Pat. No. 8,552,978 (“the ’978 patent”).

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NOTICE OF THE REAL-PARTIES-IN-INTEREST

The real-parties-in-interest for this petition are ZTE Corporation and ZTE (USA), Inc.

NOTICE OF RELATED MATTERS

The ’978 patent is asserted in the following matters:

- *Cywee Group Ltd. v. Google, Inc.*, Case No. 1-18-cv-00571, (D. Del.);
- *Cywee Group Ltd. v. ZTE Corporation et al.*, Case No. 3-17-cv-02130, (S.D. Cal.);
- *Cywee Group Ltd. v. HTC Corporation et al.*, Case No. 2-17-cv-00932, (W.D. Wash.);

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