

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.  
Petitioner

v.

CYWEE GROUP LTD.  
Patent Owner

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Patent No. 8,552,978

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**MOTION FOR JOINDER TO *INTER PARTES* REVIEW IPR2018-01257**

**TABLE OF CONTENTS**

	<b>Page</b>
I. STATEMENT OF THE PRECISE RELIEF REQUESTED .....	1
II. STATEMENT OF MATERIAL FACTS .....	2
III. STATEMENT OF REASONS FOR RELIEF REQUESTED .....	3
A. Legal Standard.....	3
B. Each of the Relevant Factors Weighs in Favor of the Board Granting the Motion for Joinder .....	3
1. Joinder with the Google IPR Is Appropriate .....	4
2. Petitioner Does Not Propose New Grounds of Unpatentability.....	5
3. Joinder Will Not Negatively Impact the Google IPR Trial Schedule .....	5
4. Procedures to Simplify Briefing and Discovery .....	6
IV. THE CLAIM CONSTRUCTION RULE CHANGE DOES NOT AFFECT THE INSTANT PETITION AND MOTION FOR JOINDER.....	8
V. CONCLUSION.....	9

**TABLE OF AUTHORITIES**

	<b>Page(s)</b>
<b>Cases</b>	
<i>Dell, Inc. v. Network-1 Security Solutions, Inc.</i> , IPR2013-00385, Paper 17 (July 29, 2013) .....	3
<i>HTC v. Parthenon Unified Memory Architecture LLC.</i> , IPR2017-00512, Paper No. 12 (June 1, 2017).....	1
<i>LG v. Memory Integrity, LLC.</i> , IPR2015-01353, Paper No. 11 (Oct. 5, 2015) .....	3, 5, 7
<i>Noven Pharmaceuticals, Inc. v. Novartis AG</i> , IPR2014-00550, Paper No. 38 (Apr. 10, 2015).....	7
<i>Par Pharmaceutical, Inc. v. Novartis AG</i> , IPR2016-01023, Paper No. 20 (Oct. 27, 2016) .....	5
<i>Samsung Elecs. Co., Ltd. v. Raytheon Co.</i> , IPR2016-00962, Paper No. 12 (Aug. 24, 2016) .....	4
<i>Samsung Electronics America, Inc. v. Uniloc 2017 LLC</i> , IPR2018-01383, Paper 9 (Nov. 19, 2018) .....	8
<b>Statutes</b>	
35 U.S.C. § 315(c) .....	1, 3, 8
<b>Other Authorities</b>	
37 C.F.R. § 42.1(b) .....	1, 4
37 C.F.R. § 42.5(b) .....	9
37 C.F.R. §§ 42.22 and 42.122(b).....	1
37 C.F.R. § 42.53 .....	7
37 C.F.R. § 42.71(a).....	8
37 C.F.R. § 42.122 .....	8

**TABLE OF AUTHORITIES**  
**(continued)**

	<b>Page(s)</b>
37 C.F.R. § 42.122(b) .....	1

## I. STATEMENT OF THE PRECISE RELIEF REQUESTED

Samsung Electronics Company, Ltd. (“Petitioner” or “Samsung”) respectfully submits this Motion for Joinder, concurrently with a Petition (“the Samsung Petition”) for *inter partes* review of U.S. Patent No. 8,552,978 (“the ’978 patent”) filed herewith.

Pursuant to 35 U.S.C. § 315(c), 37 C.F.R. §§ 42.22 and 42.122(b), Samsung requests institution of an *inter partes* review and joinder with *Google LLC v. Cywee Group Ltd.*, IPR2018-01257 (“the Google IPR” or “the Google proceeding”), which the Board instituted on December 11, 2018, concerning the same claims 10 and 12 of the ’978 patent at issue in the Samsung Petition. This request is being submitted within the time frame set forth in 37 C.F.R. § 42.122(b).

Samsung submits that this request for joinder is consistent with the policy surrounding *inter partes* reviews, as it is the most expedient way to “to secure the just, speedy, and inexpensive resolution of every proceeding.” *See* 37 C.F.R. § 42.1(b); *see also HTC v. Parthenon Unified Memory Architecture LLC.*, IPR2017-00512, Paper No. 12 at 5-6 (June 1, 2017). The Samsung Petition and the Petition in the Google IPR are substantially identical; they contain the same grounds (based on the same prior art combinations and supporting evidence) against the same claims. (*See* Ex. 1012, illustrating changes between the instant Petition and the Petition in IPR2018-01257.) Further, upon joining the Google proceeding,

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