

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics Co., Ltd.

Petitioner

v.

Cywee Group Ltd.

Patent Owner

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	Comparison between the Current Petition and Petition in IPR2018-01257

Samsung Electronics, Co., Ltd. (“Petitioner”) 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”). This Petition is being submitted concurrently with a Motion for Joinder. Specifically, Petitioner requests institution 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. This Petition is substantially identical to the Petition in the Google IPR; it contains 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.)

COUNSEL & SERVICE INFORMATION

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NOTICE OF THE REAL-PARTIES-IN-INTEREST

The real-parties-in-interest are Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.

NOTICE OF RELATED MATTERS

The ’978 patent is asserted in the following matters:

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