

Petition for *Inter Partes* Review
U.S. Patent No. 8,552,978

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS INC.
Petitioner

v.

CYWEE GROUP LTD.
Patent Owner

Case IPR2019-00560
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	Institution Decision for IPR2018-01257 (paper 8)

LG Electronics Inc. (“Petitioner”) respectfully requests *inter partes* review under 35 U.S.C. §311 of claims 10 and 12 of U.S. Pat. 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. Petitioner authorizes the Office to charge Account No. 50-0310 for fees set forth in 37.C.F.R. § 42.15(a), and further authorizes payment of additional fees to be charged to that Account.

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