

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HUAWEI DEVICE USA, INC., HUAWEI DEVICE CO. LTD., HUAWEI
TECHNOLOGIES CO. LTD., HUAWEI DEVICE (DONGGUAN) CO. LTD.,
HUAWEI INVESTMENT & HOLDING CO. LTD., HUAWEI TECH.
INVESTMENT CO. LTD., HUAWEI DEVICE (HONG KONG) CO. LTD.

Petitioners

v.

CYWEE GROUP LTD.
(record) Patent Owner

Case No. IPR2019-XXX
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)

Petitioners respectfully request *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 with *Google LLC v. Cywee Group Ltd.*, IPR2018-01257 (“the Google IPR”), 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. The only changes address the different petitioners and counsel, as well as the intervening rule change regarding claim construction.

NOTICE OF LEAD AND BACKUP COUNSEL; SERVICE INFORMATION

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NOTICE OF THE REAL-PARTIES-IN-INTEREST

The real-parties-in-interest are the Petitioners.

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.);
- *Cywee Group Ltd. v. Motorola Mobility LLC*, Case No. 1-17-cv-00780, (D. Del.);
- *Cywee Group Ltd. v. Huawei Technologies Co., Inc. et al.*, Case No. 2-17-cv-00495, (E.D. Tex.);
- *Cywee Group Ltd. v. LG Electronics, Inc. et al.*, Case No. 3-17-cv-01102, (S.D. Cal.);
- *Cywee Group Ltd. v. Samsung Electronics Co. Ltd. et al.*, Case No. 2-17-cv-00140, (E.D. Tex.);
- *Cywee Group Ltd. v. Apple Inc.*, Case No. 4-14-cv-01853, (N.D. Cal.).

The '978 patent has been challenged in the Google IPR. Petitioners have concurrently filed a motion to join that proceeding. The '978 patent is also at issue

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