IPR2019-00613 U.S. Patent No. 9,633,373

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

FIRSTFACE CO., LTD.,

Patent Owner.

Case IPR2019-006131

U.S. Patent No. 9,633,373

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

¹ Case IPR2019-01011 has been consolidated with this proceeding.

DOCKE.

Δ

TABLE OF CONTENTS

I.	INTRODUCTION			
II.	GROUND 1: THE COMBINATION OF GRIFFIN, DAVIS, AND IOS RENDERS OBVIOUS THE CHALLENGED CLAIMS1			
	A.	The Combination of Griffin and iOS Discloses an Activation Button Separate From a Power Button1		
Display and Initiating a Fingerprint Au		The Combination of Griffin and Davis Discloses Turning on the Display and Initiating a Fingerprint Authentication Function in Response to a One-Time Pressing of the Activation Button		
		1. The Claims Are Not Limited to a Single Step or a Single User Action for Pressing the Activation Button and Scanning a Fingerprint		
		2. The Combination of Griffin and Davis Discloses the Express Language of the Claim		
		 Petitioner's Modification of Davis's Figure 4 Is Expressly Taught by Davis		
	C.	A POSITA Would Have Been Motivated to Combine Griffin, Davis, and iOS16		
III.		UND 2: THE COMBINATION OF GOERTZ, DAVIS, AND RENDERS OBVIOUS THE CHALLENGED CLAIMS19		
	A.	The Combination of Goertz and iOS Discloses an Activation Button Separate From The Power Button and Configured to Turn on The Display		
	B.	The Combination of Goertz and Davis Discloses Turning on the Display Initiating a Fingerprint Function in Response to a One- Time Pressing of the Activation Button		
	C.	A POSITA Would Have Been Motivated to Combine Goertz, Davis, and iOS25		

IPR2019-00613 U.S. Patent No. 9,633,373

IV.	CONCLUSION	28
IV.	CONCLUSION	••••4

IPR2019-00613 U.S. Patent No. 9,633,373

TABLE OF AUTHORITIES

Page(s)

Cases

Accent Packaging, Inc. v. Leggett & Platt, Inc., 707 F.3d 1318 (Fed. Cir. 2013)	9
Akzo Nobel Coatings, Inc. v. Dow Chemical Co., 811 F.3d 1334 (Fed. Cir. 2016)	5
Bausch & Lomb v. Barnes-Hind/Hydrocurve, 796 F.2d 443 (Fed. Cir. 1986)	.16
<i>In re Gordon</i> , 733 F.2d 900 (Fed. Cir. 1984)	.17
In re Merck & Co., Inc., 800 F.2d 1091 (Fed. Cir. 1986)	.13
Kinetic Concepts, Inc. v. Smith & Nephew, Inc. 688 F.3d 1342 (Fed. Cir. 2012)	.26
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)	.24
<i>Merck & Co. v. Teva Pharm. USA, Inc.,</i> 395 F.3d 1364 (Fed. Cir. 2005)	5
In re Mouttet, 686 F.3d 1322 (Fed. Cir. 2012)	.13

GLOSSARY	OF ABBREVIATIONS
-----------------	-------------------------

Shorthand	Description
Challenged Claims or Claims	Claims 1-2, 4-6, 10-14, and 18 of U.S. Patent No. 9,633,373
P1	IPR2019-00613, Paper 2, Petition for Inter Partes Review
P2	IPR2019-01011, Paper 1, Petition for Inter Partes Review
ID1	IPR2019-00613, Paper 10, Decision Granting Institution of Inter Partes Review
ID2	IPR2019-01011, Paper 9, Decision Granting Institution of <i>Inter</i> <i>Partes</i> Review
РО	Patent Owner
POSITA	Person of Ordinary Skill in the Art
POR or Response	IPR2019-00613, Paper 16, Patent Owner's Response to Petition
POPR	IPR2019-00613, Paper 8, Patent Owner's Preliminary Response to Petition

Note: All emphasis herein added unless otherwise stated.

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.