

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

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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APPLE INC.,

Petitioner,

v.

FIRSTFACE CO., LTD.,

Patent Owner.

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Case IPR2019-00613  
Case IPR-2019-01011  
U.S. Patent No. 9,633,373

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**PATENT OWNER'S SUR-REPLY TO PETITION**

## TABLE OF CONTENTS

I.	Introduction.....	1
II.	Ground 1: The Combination of Griffin, Davis, and iOS Does Not Render Obvious the Challenged Claims .....	1
	A. The Combination of Griffin and iOS Fails to Disclose an Activation Button Separate from a Power Button.....	2
	B. The Combination of Griffin and Davis Fails to Disclose Turning on the Display and Performing a First Function in Response to a One-Time Pressing of the Activation Button.....	4
	1. The Challenged Claims require performance, not just initiation, of a first function in response to a press of the activation button. ....	4
	2. The combination of Griffin and Davis fails to disclose performing a fingerprint authentication function in response to a one-time pressing of the activation button. ....	8
	C. A POSITA Would Not Have Been Motivated to Combine Griffin, Davis, and iOS.....	11
III.	Ground 2: The Combination of Goertz, Davis, and iOS Does Not Render Obvious the Challenged Claims .....	14
	A. The Combination of Goertz and iOS Fails to Disclose an Activation Button Separate From a Power Button.....	14
	B. The Combination of Goertz and Davis Fails to Disclose Turning On the Display and Performing a First Function In Response to a One-Time Pressing of the Activation Button.....	16
	C. A POSITA Would Not Have Been Motivated to Combine Goertz, Davis, and iOS.....	18
IV.	Conclusion .....	20

## TABLE OF AUTHORITIES

### Cases:

<i>Graham v. John Deere Co. of Kan. City</i> , 383 U.S. 1 (1966).....	9, 10
<i>In re Gordon</i> , 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).....	13
<i>In re Merck &amp; Co.</i> , 800 F.2d 1091 (Fed. Cir. 1986) .....	9, 10
<i>In re Mouttet</i> , 686 F.3d 1322 (Fed. Cir. 2012) .....	9, 10
<i>Intamin Ltd. v. Magnetar Techs. Corp.</i> , 483 F.3d 1328 (Fed. Cir. 2007) .....	8
<i>Kinetic Concepts, Inc. v. Smith &amp; Nephew, Inc.</i> , 688 F.3d 1342 (Fed. Cir. 2012) .....	19
<i>Princeton Biochemicals, Inc. v. Coulter, Inc.</i> , 411 F.3d 1332 (Fed. Cir. 2005) .....	13, 19

### Rules, Statutes, and Other Authorities:

M.P.E.P § 2143.01(V).....	13
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### TABLE OF EXHIBITS

Exhibit	Description
2001	Declaration of Dr. Alfred C. Weaver
2008	Bederson Deposition Transcript

Patent Owner Firstface Co., Ltd. (“Firstface” or “Patent Owner”) submits this Sur-Reply to the Petitions<sup>1</sup> of Apple Inc. (“Apple” or “Petitioner”) seeking *inter partes* review of claims 1-2, 4-6, 10-14, and 18 of U.S. Patent No. 9,633,373 (Ex. 1001, the “’373 patent”).

## **I. Introduction**

Petitioner’s Reply, like its Petition, fails to show that the Challenged Claims are unpatentable. None of the cited art, alone or in combination, discloses all limitations of the Challenged Claims. Petitioner’s arguments otherwise rely on overly generous readings of the references and an incorrect interpretation of the Challenged Claims. The Board should reject Petitioner’s arguments and find all Challenged Claims patentable.

## **II. Ground 1: The Combination of Griffin, Davis, and iOS Does Not Render Obvious the Challenged Claims.**

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<sup>1</sup> Petitioner originally filed a Petition seeking *inter partes* review of claims 1, 2, 4–6, and 11–14 in Case IPR2019-00613. Petitioner subsequently filed a Petition seeking *inter partes* review of claims 10 and 18 in Case IPR2019-1011. The Board instituted review in both proceedings and consolidated them for trial. This Sur-Reply therefore addresses the arguments made in both Petitions.

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