

CASE IPR2019-01278  
Patent No. 8,020,083

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LENOVO HOLDING COMPANY, INC.,  
LENOVO (UNITED STATES) INC., and  
MOTOROLA MOBILITY LLC,  
Petitioners,

v.

DODOTS LICENSING SOLUTIONS LLC,  
Patent Owner.

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**PATENT OWNER DODOTS LICENSING SOLUTIONS, LLC'S**

**SUR-REPLY**

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**2007 LIST**

<b>Exhibit No.</b>	<b>Description</b>
<b>2007</b>	Supplemental Declaration of Dr. Earl Sacerdoti

## **I. Introduction**

Petitioners have failed to meet their burden of proof to show that the challenged claims should be cancelled. Petitioners' belated attempt to support a broad definition that "template" can refer to "executable code" is incorrect and tellingly is not accompanied by any expert declaration. Contrary to Petitioners' contentions, Patent Owner has used the term "template" consistently in each of the contexts in which Petitioners suggest otherwise, and Patent Owner's construction would not exclude any disclosed embodiments. When the template limitation is properly construed, none of Petitioners' proffered combinations invalidate any of the challenged claims because the applications they disclose are not templates.

Petitioners also wrongly state that the "template" limitation is the only one Patent Owner contests. Reply at 1. Patent Owner's arguments also related to the "networked information monitor" ("NIM") limitation, and those arguments have gone unrebutted. As Patent Owner explained, NIMs are frames, and NIMs are distinct from the NIM templates that are used to define them. Patent Owner Response at 1-2, 7, 12.

Objective indicia (i.e., "secondary considerations") further support the conclusion that the challenged claims are non-obvious, and Petitioners' attack on the evidence submitted by Patent Owner would raise too high of a bar for this type of evidence and likewise improperly shifts the burden to Patent Owner. Importantly,

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