

CASE IPR2019-01278 (Patent 8,020,083 B1)
CASE IPR2019-01279 (Patent 8,510,407 B1)

Lenovo Holding Company, Inc., Lenovo (United States)
Petitioners,

v.

DoDots Licensing Solutions, Inc.
Patent Owner.

PATENT OWNER'S DEMONSTRATION

Served: October 21, 2020 (per service)

Hearing: October 28, 2020, 1:00 PM Eastern Time

Administrative Patent Judges: James A. Worth, Ambrose

AGENDA

- Burden of Proof
- Claim Construction
 - NIM
 - Template
- *Hoff / Berg*
- *Razavi / Anderson*
- Dependent Claims 8 & 20 ('407 P)
- Objective Indicia
- Secret Art

BURDEN OF PROOF

- Petitioners have the burden
- Petitioners are bound by the arguments set forth
- Petitioners cannot switch theories mid-stream
- Burden never shifts to the Patent Owner to disprove

BURDEN OF PROOF

“As we embark on the next wave of technology revolutions, we must ensure that we continue with rights that are reliable, predictable, and This is, in fact, more important now than ever

- DIRECTOR ANDREI IANCU”

USPTO Website (<https://www.uspto.gov/>) (bold in original).
Patent Owner’s Response (‘407 Patent) at 3-4.

CLAIM CONSTRUCTION (NI

The parties agree that the specification defines a configurable frame with one or more controls is presented to the user.

Petitioners' Reply ('083 Patent) at 2-3; Petitioner's Reply ('407 Paten

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