



GOOGLE LLC, SAMSUNG ELECTRO
SAMSUNG ELECTRONICS AME
LG ELECTRONICS INC., AND LG ELECTR

Petitioner,

v.

PARUS HOLDINGS, IN

Patent Owner

IPR2020-00846; Patent 7,076,43

IPR2020-00847; Patent 9,451,08

Paper 27 – Order Setting Oral Arg

Overview of Issues

1

Kovatch is not prior art – Parus’s research and dev

2

Kovatch fails to disclose each claim element of the

3

Written description sufficient – *Kurganov-262* is n

Grounds

IPR2020-00846

Ground	Reference	Basis	Ch
I	<i>Kovatch, Neal</i>	§103	1, 2
II	<i>Kovatch, Neal, Chakrabarti</i>	§103	1, 2
III	<i>Kovatch, Neal, DeSimone</i>	§103	14
IV	<i>Kovatch, Neal, Chakrabarti, DeSimone</i>	§103	14
V	<i>Kurganov-262, Chakrabarti</i>	§103	9
VI	<i>Kurganov-262, Chakrabarti, DeSimone</i>	§103	14

IPR2020-00847

Ground	Reference	Basis	Ch
I	<i>Kurganov-262, Chakrabarti</i>	§103	1-2
II	<i>Kurganov-262, Chakrabarti</i>	§103	14
III	<i>Kovatch, Chakrabarti, Neal</i>	§103	1-2
IV	<i>Kovatch, Chakrabarti, Neal, DeSimone</i>	§103	14

Kovatch Not Prior A

Kovatch Is Not Prior Art

- All Grounds Fail Because *Kovatch* Is Not Prior Art
- Parus can swear behind *Kovatch*
 - Parus was working on the Webley Assistant II starting
 - Parus reduced to practice in early January 2000
 - Parus had multiple people working on the Webley Ass the reduction to practice

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