UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., LG ELECTRONICS INC., and LG ELECTRONICS U.S.A., INC., Petitioners,

v.

PARUS HOLDINGS INC., Patent Owner.

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Case No. IPR2020-00846 Patent No. 7,076,431

## PETITIONERS' REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE



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#### **TABLE OF AUTHORITIES**

#### **CASES**

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Apple v. Maxell, IPR2020-00204, Paper 11 (June 19, 2020)
Apple v. Seven Networks, IPR2020-00156, Paper 10 (June 15, 2020)
<i>Bradium Techs. v. Iancu</i> , 923 F.3d 1032 (Fed. Cir. 2019)
Google v. Uniloc 2017, IPR2020-00441, Paper 13 (July 17, 2020)2
In re: Adobe Inc., 2020 WL 4308164 (Fed. Cir. July 28, 2020)
Multimedia Content Management v. Dish Network, Civil No. 6:18-CV-00207 (W.D. Tex. May 30, 2019) (J. Albright)1
Nalox-1 Pharms. v. Opiant Pharms., IPR2019-00685, Paper 11 (Aug. 27, 2019)5
Sand Revolution v. Continental Intermodal Group—Trucking, IPR2019-01393, Paper 24 (June 16, 2020) (informative)
STATUTES
35 U.S.C. § 315(b)
35 U.S.C. § 316(b)7



## **LISTING OF EXHIBITS**

Exhibit	Description
1001	U.S. Patent 7,076,431 ("'431 patent")
1002	Declaration of Stuart J. Lipoff ("Lipoff")
1003	Curriculum Vitae of Stuart J. Lipoff
1004	U.S. Patent Publication 2001/0047262 ("Kurganov-262")
1005	PCT Publication WO2001/050453 ("Kovatch")
1006	U.S. Provisional Application 60/174,371 ("Kovatch-Provisional")
1007	U.S. Patent 6,324,534 ("Neal")
1008	U.S. Patent 6,418,433 ("Chakrabarti")
1009	U.S. Patent 5,787,470 ("DeSimone")
1010	U.S. Patent 5,855,020
1011	U.S. Patent 6,085,160
1012	U.S. Patent 6,434,524
1013	McGraw-Hill Electronics Dictionary (6th ed. 1997) ("McGraw-Hill")
1014	American Heritage Dictionary of the English Language (3d ed. 1996)
1015	Dictionary of Computing (4th ed. 2002)
1016	Scheduling Order (Dkt. 85), Parus v. Apple Inc., 6:19-cv-00432-ADA
	(consolidated cases) (W.D. Tex. Jan. 17, 2020)
1017	Parus Holding's Inc.'s First Amended Complaint for Patent
	Infringement, Parus Holdings Inc. v. Apple Inc., 6:19-cv-00432-ADA
	(W.D. Tex. Oct. 21, 2019)
1018	Parus Holding's Inc.'s First Amended Complaint for Patent
	Infringement, Parus Holdings Inc. v. Google LLC, 6:19-cv-00433-
	ADA (W.D. Tex. Oct. 21, 2019)
1019	Parus Holding's Inc.'s First Amended Complaint for Patent
	Infringement, Parus Holdings Inc. v. LG Electronics, Inc. et al., 6:19-
	cv-00437-ADA (W.D. Tex. Dec. 5, 2019)
1020	Parus Holding's Inc.'s First Amended Complaint for Patent
	Infringement, Parus Holdings Inc. v. Samsung Electronics Co., Ltd. et
	al., 6:19-cv-00438-ADA (W.D. Tex. Nov. 19, 2019)
1021	U.S. Patent 9,451,084 ("'084 patent")
1022	U.S. Provisional Application 60/180,344
1023	U.S. Provisional Application 60/233,068
1024	Prosecution History of U.S. Patent Application 09/776,996
	(U.S. Patent 6,721,705)
1025	Prosecution History of U.S. Patent Application 10/821,690



Exhibit	Description
	(U.S. Patent 7,076,431)
1026	Prosecution History of U.S. Patent Application 11/409,703
	(U.S. Patent 7,386,455)
1027	Prosecution History of U.S. Patent Application 12/030,556
	(U.S. Patent 7,881,941)
1028	Prosecution History of U.S. Patent Application 12/973,475
	(U.S. Patent 8,185,402)
1029	Prosecution History of U.S. Patent Application 13/462,819
	(U.S. Patent 9,451,084)
1030	Prosecution History of U.S. Patent Application 15/269,776
	(U.S. Patent 10,096,320)
1031	Prosecution History of U.S. Patent Application 16/155,523
	(pending)
1032	Order Granting Defendant LG's Motion to Transfer Venue Under 28
	U.S.C. § 1404, Parus Holdings Inc. v. LG Elecs. Inc. & LG Elecs.
	U.S.A., Inc., 6:19-CV-00437-ADA (Aug. 6, 2020)
1033	Lauren A. Watt & Graham C. Phero, Success of Motions to Stay
	Rising, But Why?, https://www.sternekessler.com/news-
	insights/publications/success-motions-stay-rising-why (Feb. 2020)
	(last checked Aug. 25, 2020)
1034	Order Regarding Court Operation Under the Exigent Circumstances
	Created by the COVID-19 Pandemic (C.J. Garcia) (Mar. 13, 2020)
1035	Supplemental Order Regarding Court Operation Under the Exigent
	Circumstances Created by the COVID-19 Pandemic (C.J. Garcia)
	(Apr. 15, 2020)
1036	Supplemental Order Regarding Court Operation Under the Exigent
	Circumstances Created by the COVID-19 Pandemic (C.J. Garcia)
	(May 8, 2020)
1037	Supplemental Order Regarding Court Operation Under the Exigent
	Circumstances Created by the COVID-19 Pandemic (C.J. Garcia)
	(June 18, 2020)
1038	Supplemental Order Regarding Court Operation Under the Exigent
	Circumstances Created by the COVID-19 Pandemic (C.J. Garcia)
	(July 2, 2020)
1039	Supplemental Order Regarding Court Operation Under the Exigent
	Circumstances Created by the COVID-19 Pandemic (C.J. Garcia)
	(Aug. 6, 2020)
1040	PACER Docket Activity Report (Criminal Matters) for the United



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