

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

LBT IP I LLC,

Patent Owner

Case IPR2020-01189
U.S. Patent No. 8,497,774

**PATENT OWNER'S RESPONSE
TO PETITION FOR *INTER PARTES* REVIEW
OF U.S. PAT. NO. 8,497,774**

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I. INTRODUCTION1

II. PETITIONER HAS NOT MET ITS BURDEN OF SHOWING BY CLEAR AND CONVINCING EVIDENCE THAT ANY OF THE CHALLENGED CLAIMS ARE INVALID AS OBVIOUS.4

 A. The Prior Art Relied Upon By The Petitioner Does Not Disclose Limitation 1(e) “Local Battery Power Adjustment Mechanism to Generate in Substantially Real-Time an Updated Set of Network Communication Signaling Protocols Associated with at least one of a Request Rate of Location Coordinate Packets to be Communicated to a Target Host and a Listen Rate of the Location Coordinate Packets From a Satellite Navigation System, the Updated Set of Network Communication Signaling Protocols Having a Value That is Responsive to a User Input Request.”4

 B. The Prior Art Relied Upon By The Petitioner Does Not Disclose Limitation 8(c) “an Electrical Power Resource Management Component to Adjust Cycle Timing of at Least one of a Request Rate of Location Coordinate Packets to a Target Host and a Listen Rate of the Location Coordinate Packets Responsive to an Estimated Charge Level of the Charging Unit.”10

 C. The Prior Art Relied Upon By The Petitioner Does Not Disclose Limitation 8(d) “Wherein the Battery Power Level Monitor Measures a Power Level of the Charging Unit and Adjusts a Power Level Applied to Location Tracking Circuitry Responsive to One or More Signal Levels, the Power Level Comprising a Multitude of Threshold Values Determined by a User or System Administrator to Intermittently Activate or Deactivate the Location Tracking Circuitry to Conserve Power of the Charging Unit in Response to the Estimated Charge Level of the Charging Unit.”12

III. RESERVATION OF RIGHTS17

IV. CONCLUSION.....18

PATENT OWNER'S EXHIBIT LIST

Exhibit Number	Description
2001	Declaration of Brian S. Seal in support of Patent Owner's Unopposed Motion For <i>Pro Hac Vice</i> Admission
2002	Revised Declaration of Brian S. Seal in support of Patent Owner's Unopposed Motion For <i>Pro Hac Vice</i> Admission
2003	Transcript of deposition of Scott Andrews
2004	U.S. Pub. No. 2009/0174603 (Appl. No. 11/969,905)
2005	Sun, U.S. Patent Number 7,612,663
2006	Syrjarinne et al., U.S. Pub. No. 2005/0113124
2007	Suprun et al., U.S. Patent Number 7,292,223
2008	Croyle et al., U.S. Patent Number 5,862,511
2009	Lau et al., U.S. Patent Number 5,592,173
2010	Tsai, U.S. Pub. No. 2007/0057068
2011	Huang et al., U.S. Patent Number 7,826,968
2012	File history of U.S. Patent Number 8,421,619
2013	U.S. Pub. No. 2009/0189807 (Appl. No. 12/419,451)

...

TABLE OF AUTHORITIES

Cases

Arthrex, Inc. v. Smith & Nephew, Inc.,
941 F.3d 1320 (Fed. Cir. 2019), cert. granted, 141 S. Ct. 551 (2020)18

Phillips v. AWH Corp.,
415 F.3d 1303 (Fed. Cir. 2005) (*en banc*)16

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