

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner

v.

LBT IP I LLC,

Patent Owner

Case IPR2020-01192
U.S. Patent No. 8,421,618

**PATENT OWNER'S RESPONSE
TO PETITION FOR *INTER PARTES* REVIEW
OF U.S. PAT. NO. 8,421,618**

TABLE OF CONTENTS

PATENT OWNER’S EXHIBIT LIST	II
TABLE OF AUTHORITIES	III
I. INTRODUCTION	1
II. LEVEL OF ONE OF ORDINARY SKILL IN THE ART	2
III. SAKAMOTO DOES NOT INVALIDATE CLAIMS 1-24.....	2
A. OVERVIEW OF SAKAMOTO	2
B. SAKAMOTO DOES NOT DISCLOSE SELECTIVELY ACTIVATING AND DEACTIVATING AT LEAST ONE PORTION OF THE TRANSCEIVER CIRCUITRY AND LOCATION TRACKING CIRCUITRY ... IN RESPONSE TO A SIGNAL LEVEL” AS REQUIRED BY CLAIMS 1-24.	4
IV. RESERVATION OF RIGHTS.....	13
V. CONCLUSION	14

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)

Case IPR2020-01192
U.S. Patent No. 8,421,618

TABLE OF AUTHORITIES

Cases

Arthrex, Inc. v. Smith & Nephew, Inc.,
941 F.3d 1320 (Fed. Cir. 2019), cert. granted, 141 S. Ct. 551 (2020)17

...

As required by 37 C.F.R. § 42.22(a)(2), the Petition must include “a full statement of the reasons for the relief requested, including a detailed explanation of the significance of the evidence including material facts.” The Petition and its allegedly supporting evidence fail to satisfy that requirement and fail to establish by a preponderance of the evidence that the challenged claims of U.S. Patent No. 8,412,618 (the “’618 Patent”) are unpatentable. As explained in further detail below, the Petition and its supporting evidence fail to adequately demonstrate how the cited references expressly or inherently disclose all elements required by the claims.

I. INTRODUCTION

The ’618 Patent describes a device and method to monitor location coordinates of an electronic tracking device. Ex. 1001, Abstract. The device includes transceiver circuitry, accelerometer circuitry, a battery power monitor to selectively activate and deactivate at least one portion of the transceiver circuitry and location tracking circuitry, and processor circuitry. *Id.*

Independent claim 1 recites, in part:

accelerometer circuitry to measure displacements of the portable electronic tracking device;

a battery power monitor configured to selectively activate and deactivate at least one portion of the transceiver circuitry and location

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