SUNG ELECTRONICS CO. LTD. AND
SUNG ELECTRONICS AMERICA, INC.,
oners

GLOBAL PRODUCTS, LTD.,
t Owner

_____
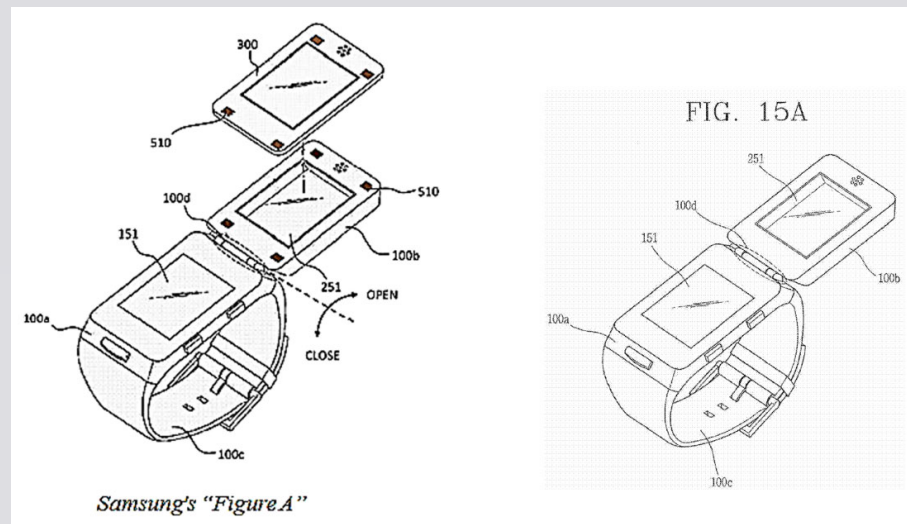
021-00335, -00336, -00337, -00338

ntation of Patent Owner GUI Global Products, Ltd.
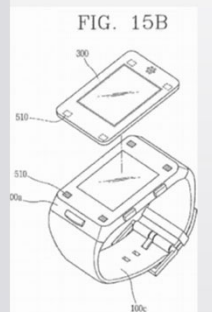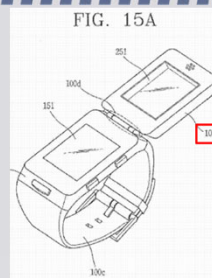
ng Date: April 12, 2022

Petitioner's Figure A, which is adapted from Kim's watch-type embodiment depicted in Fig. 15A , forms the basis for Petitioner's allegations of unpatentability.

Petition, 20-21

Kim Does Not Disclose Petitioner's Fictional Figure A Device
(Claim 1 of '320, '077, '021 and '020 Patents)

Kim teaches coupling sub-device 300 to and atop the second body of the watch-type device. '320 POR, 7; EX2004, ¶48.

FIG. 15A

[0256] As shown in FIG. **15***a*, the watch type mobile terminal includes the first body **100***a* to which a band part **100***c* is connected and the second body **100***b* including a display unit and coupled to the first body and. The second body may be configured to be connected by a hinge **100***d* to one side of the first body so as to be open or closed. The second body may be referred to as a cover, and the first body may include a display unit to configure a dual-display together with the display unit of the second body.

…

FIG. 15B

[0260] A method of coupling the third body (i.e., the sub-device) is coupled to one of the first and second bodies in a state that the first and second bodies are coupled will now be described. The method of coupling the sub-device in an overlapping manner to the second body will now be described for the sake of brevity.

[0261] As shown in FIG. **15***b*, a coupling member **510** for fixing the sub-device is provided on at least one side of the second body of the main device, and the sub-device may be adjusted to the position where the coupling member is formed, and pressed to be coupled.

This arrangement:

- Allows the watch-type device to operate as a dual-display device. EX1010, [0256]; '320 POR, 7; EX2004, ¶48

- Allows the cover of the watch-type device to properly open and close via hinge 100d. '320 POR, 7; EX2004, ¶48

- Provides an attractive consumer electronic device in terms of its size, form factor, and appearance. '320 POR, 7; EX2004, ¶48

Kim Does Not Disclose Petitioner's Fictional Figure A Device

does not teach mixing physical aspects of separate

er-type and watch-type embodiments. The

bodiments" referred to in the second (and third)

ence of ¶179 are merely the "*embodiments for a control*

hod" noted in the prior sentence.

[0179] Embodiments for a control method in the mobile terminal **100** may now be described with reference to the accompanying drawings. Embodiments may be used singly and/or by being combined together. Embodiments may be implemented more easily when the display **151** includes the touchscreen.

EX1010, [0179]

POSITA Would Not be Motivated to Create a Non-Functional, Deeply Flawed and Unsuitable Figure A Device

...er's expert acknowledges that, when designing a wearable ...uch as a watch-type device, a POSITA would have ...red such things as its size and weight, its form factor ...ng its shape), the miniaturization of its electronics, and its ...ppearance. EX2002, 15:11–16:19; 18:13–21:2; 33:18–35:5.

```
25    A     The size importance was -- at the time that we
 1  were dealing with was that it should be a device that
 2  could be wear as a watch on the wrist or it could
 3  possibly be a -- a band on the arm in a similar fashion
 4  that some of the phones, for example, that are connected
 5  to the arm with the band, and related areas.
 6    Q     Why was that important?
 7    A     The importance of that was, obviously, the
 8  size.
 9    Q     So do you mean if it was too big, people
10  wouldn't wear it?
11    A     It had to have a reasonable size in general so
12  that it was reasonable for a person to -- to use that
13  and wear it.
```

EX2002, 15:11–16:19

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