UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO. LTD. AND SAMSUNG ELECTRONICS AMERICA, INC., Petitioners,

v.

GUI GLOBAL PRODUCTS, LTD., Patent Owner.

Case IPR2021-00336 Patent 10,259,021 B2

PATENT OWNER'S RESPONSE TO PETITION FOR *INTER PARTES* REVIEW



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Dynamic Drinkware, LLC v. Nat'l Graphics, Inc., 800 F.3d 1375 (Fed. Cir. 2015)
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Hulu, LLC v. Sound View Innovations, LLC (IPR2018-00582, Paper 34)	2
Johns Manville Corp. v. Knauf Insulation, Inc. (IPR2018-00827, Paper 9)	2
Richardson v. Suzuki Motor Co., 868 F.2d 1226 (Fed. Cir. 1989)	36
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Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628 (Fed. Cir. 1987)	36



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