

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 IPR2021-00337  
Patent 10,562,077 B2

---

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

TABLE OF CONTENTS

I. INTRODUCTION AND SUMMARY OF ARGUMENTS. ....1

II. THE ‘077 PATENT.....2

III. CLAIM CONSTRUCTION. ....4

IV. KIM DOES NOT DISCLOSE (OR SUGGEST) PETITIONER’S  
“FIG. A” EMBODIMENT .....4

A. Overview of Kim. ....4

B. Kim Does Not Diclose (or Suggest) Petitioner’s Figure A Embodiment .....6

V. PETITIONER’S FICTIONAL FIG. A IS NOT OBVIOUS. ....9

A. Kim’s Fig. 11B does Not Support Obviousness of Fictional Fig. A.....9

B. Kim’s Mixing of Control Methods is Different from Mixing Form  
Factors.....17

C. Petitioner Misapprehends Kim’s Disclosure for Figure 15A-D.....19

D. Kim’s Fig. 5 Shows How a Dual Display Device Would Be  
Fashioned .....26

E. The Gap that Would Result from Petitioner’s Fictional Figure A Causes More  
Than Just Potential Harm or Esthetic Problems. ....29

F. Sandwiching Sub-Device 300 as in Petitioner’s Figure A Leads to  
Problems with Displaying Information .....31

G. Petitioner’s Proposed Figure A Embodiment Presents Too Many  
Operating Issues That Would Prevent a POSITA From Adoption .....32

VI. CLAIM 1 AND ITS DEPENDENT CLAIMS ARE NOT  
UNPATENTABLE IN VIEW OF KIM. ....36

A. Kim Does Not Disclose or Render Obvious “When Coupled, The  
First Case Functions to Protect the Second Case.” .....36

B.	Kim Does Not Disclose or Render Obvious “a First Magnet is Fully Disposed Within the Electronic Device.” .....	40
C.	Petitioner Has Not Shown that Kim Discloses (or Suggests) a “Switching Device.” .....	44
D.	Kim Does Not Disclose or Render Obvious “the electronic device comprises at Least one element selected from the group consisting of...recessed areas,...indented shapes,...raised shapes, and combinations thereof; configured to correspond to complimentary surface elements on the switching device.” .....	45
E.	Petitioner Fails to Show where Kim Discloses or Renders Obvious that the “Portable Switching Device” is “Configured to Activate, Deactivate or Send into Hibernation” the Portable Electronic Device. ....	49
F.	Kim Does Not Disclose (or Render Obvious) That the “Electronic Device Plays, Pauses and/or Changes the Volume of a Remote Device.” .....	52
G.	Kim Does Not Disclose or Render Obvious that the “Lid is Recessed to Configure to the Electronic Device” .....	53
VII.	CLAIM 5 AND ITS DEPENDENT CLAIMS ARE NOT UNPATENTABLE IN VIEW OF KIM.....	56
VIII.	CLAIM 11 IS NOT UNPATENTABLE IN VIEW OF THE COMBINED TEACHINGS OF KIM AND KOH.....	59
A.	A POSITA Would Not Have Been Motivated to Combine Kim and Koh.....	59
B.	The Combination of Kim and Koh Does Not Disclose or Render Obvious “When Coupled, the First Case Functions to Protect the Second Case” .....	61
C.	Petitioner Fails to Explain How the Combined Koh Portable “Switching Device” is “Configured to Activate, Deactivate, or Send into Hibernation” the Portable Electronic Device.....	69
D.	The Combination of Kim and Koh Does Not Disclose “plays, pauses and/or changes the volume of a remote device.” .....	71

IX.	CLAIM 9 IS NOT UNPATENTABLE IN VIEW OF THE COMBINED TEACHINGS OF KIM AND LEE .....	73
A.	A POSITA Would Not Have Been Motivated to Combine Kim and Lee. ...	73
B.	The Combination of Kim and Lee Does Not Suggest a Magnet “Employed in Actuating the Electronic Circuit.” .....	74
X.	CLAIM 10 IS NOT UNPATENTABLE IN VIEW OF THE COMBINED TEACHINGS OF KIM AND LEE .....	75
XI.	CLAIMS 12 AND 13 ARE NOT UNPATENTABLE IN VIEW OF THE COMBINED TEACHINGS OF KIM AND LEE .....	76
XII.	CONCLUSION.....	76

## TABLE OF AUTHORITIES

### CASES

<i>CFMT, Inc. v. Yieldup Intern. Corp.</i> , 349 F.3d 1333 (Fed. Cir. 2003) .....	37
<i>Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.</i> , 800 F.3d 1375 (Fed. Cir. 2015) .....	37
<i>Harmonic Inc. v. Avid Tech., Inc.</i> , 815 F.3d 1356 (Fed. Cir. 2016).....	37
<i>Hulu, LLC v. Sound View Innovations, LLC</i> (IPR2018-00582, Paper 34) .....	2
<i>Johns Manville Corp. v. Knauf Insulation, Inc.</i> (IPR2018-00827, Paper 9) .....	2
<i>Richardson v. Suzuki Motor Co.</i> , 868 F.2d 1226 (Fed. Cir. 1989).....	36
<i>SAS Inst. Inc. v. Iancu</i> , 138 S. Ct. 1348 (2018) .....	37
<i>Verdegaal Bros. v. Union Oil Co. of California</i> , 814 F.2d 628 (Fed. Cir. 1987)....	36

# Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

## Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

## Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

## Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

## API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

## LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

## FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

## E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.