



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

GLOBAL PRODUCTS, LTD.,
Pat Owner

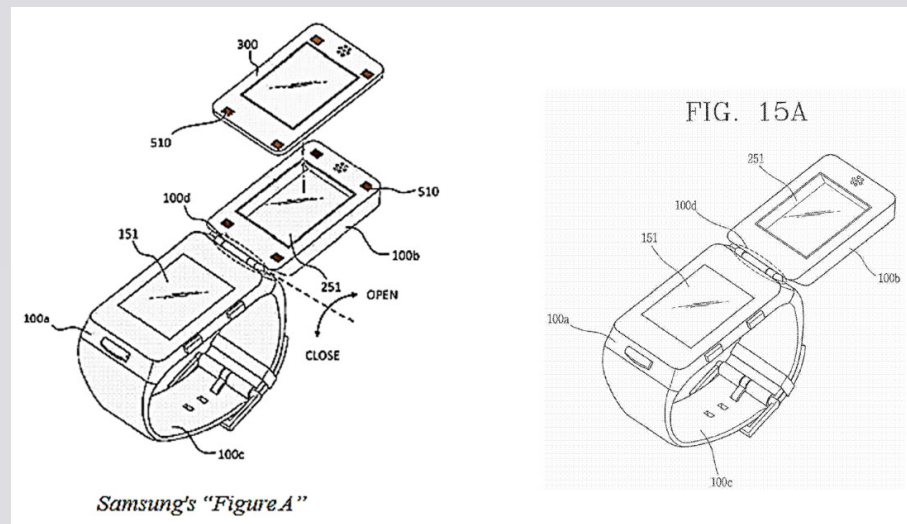
021-00335, -00336, -00337, -00338

ntation of Patent Owner GUI Global Products, Ltd.

ng Date: April 12, 2022

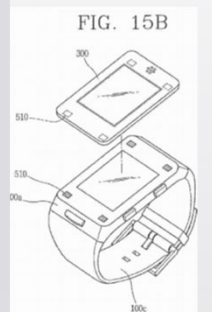
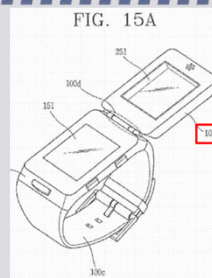
Petitioner's Figure A, which is adapted from Kim's watch-type embodiment depicted in Fig. 15A, forms the basis for Petitioner's allegations of unpatentability.

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.



[0256] As shown in FIG. 15a, the watch type mobile terminal includes the first body 100a to which a band part 100c is connected and the second body 100b including a display unit and coupled to the first body and. The second body may be configured to be connected by a hinge 100d 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.

[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. 15b, 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 such as a watch-type device, a POSITA would have considered such things as its size and weight, its form factor (including its shape), the miniaturization of its electronics, and its appearance. 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

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.