

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TCT MOBILE (US), INC.; TCT MOBILE (US) HOLDINGS, INC.; HUIZHOU
TCL MOBILE COMMUNICATION CO. LTD.; AND TCL COMMUNICATION,
INC.,

Petitioners,

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,

Patent Owner.

Case No. IPR2021-00395
Patent No. 7,239,111

**PATENT OWNER FUNDAMENTAL INNOVATION SYSTEMS
INTERNATIONAL LLC'S NOTICE PURSUANT TO 37 C.F.R. 42.8**

Pursuant to 37 C.F.R. 42.8, the Patent Owner Fundamental Innovation Systems International LLC hereby submits the following Notice.

I. Real Party-In-Interest

Fundamental Innovation Systems International LLC is the owner of U.S. Patent No. 7,239,111 (“the '111 patent”), and Fundamental Innovation Systems International Holdings LLC is the parent entity of Fundamental Innovation Systems International LLC.

II. Related Matters

The Patent Owner identifies the following matters that may be deemed related pursuant to 37 C.F.R. § 42.8(b)(2):

- *Fundamental Innovation Systems International LLC v. Coolpad Group Limited. et al.*, No. 2:20-cv-00117 (E.D. Tex.);
- *Fundamental Innovation Systems International LLC v. Lenovo (United States) Inc., et al.*, No. 1:20-cv-000551 (D. Del.)
- *Fundamental Innovation Systems International LLC v. TCT Mobile (US) Inc., et al.*, No. 1:20-cv-000552 (D. Del.)
- *Fundamental Innovation Systems International LLC v. Belkin, Inc., et al.*, No. 1:20-cv-000550 (D. Del.) (settled)
- *Fundamental Innovation Systems International LLC v. BLU Prods. Inc.*, No. 1:20-cv-21721 (S.D. Fl.) (settled)

IPR2021-00395

Patent No. 7,239,111

- *Fundamental Innovation Systems International LLC v. Aukey Tech Co., Ltd.*, No. 2:20-cv-00116 (E.D. Tex.) (settled)
- *Fundamental Innovation Systems International LLC v. Jasco Prods Co., LLC*, No. 2:20-cv-00118 (E.D. Tex.) (settled)
- *Fundamental Innovation Systems International LLC v. OnePlus Technology (Shenzhen) Co., Ltd et al.*, No. 2:20-cv-00119 (E.D. Tex.) (settled)
- *Fundamental Innovation Systems International LLC v. Apple, Inc.*, No. 3:19-cv-00048 (N.D. Cal.) (settled)
- *Fundamental Innovation Systems International LLC v. ZTE Corp.*, No. 3:17-cv-01827 (N.D. Tex.) (settled)
- *Fundamental Innovation Systems International LLC v. Samsung Electronics Co. Ltd. et al.*, No. 2:17-cv-00145 (E.D. Tex.) (settled)
- *Fundamental Innovation Systems International LLC v. LG Electronics, Inc. et al.*, No. 2:16-cv-01425 (E.D. Tex.) (settled)
- *Fundamental Innovation Systems International LLC v. Huawei Investment & Holding Co., Ltd. et al.*, No. 2:16-cv-01424 (E.D. Tex.) (settled)
- The '111 patent was the subject of the following IPRs:

IPR2021-00395
Patent No. 7,239,111

- *ZTE (USA) Inc. et al. v. Fundamental Innovation Systems International LLC*, IPR2018-00276 (institution denied)
- *LG Electronics Inc. et al. v. Fundamental Innovation Systems International LLC*, IPR2018-00495 (institution denied)
- *Huawei Device Co., Ltd. et al. v. Fundamental Innovation Systems International LLC*, IPR2018-00487 (institution denied)
- The '111 patent is a continuation application of U.S. Application No. 10/087,629, filed Mar. 1, 2002, now U.S. Patent No. 6,936,936; which claims priority from U.S. Provisional Application Nos. 60/330,486, filed Oct. 23, 2001, and 60/273,021, filed Mar. 1, 2001.
- The '111 patent has seven children applications:
 - U.S. Application No. 11/749,680, filed on May 16, 2007, now U.S. Patent No. 7,453,233;
 - U.S. Application No. 12/268,297, filed on Nov. 10, 2008, now U.S. Patent No. 7,737,657;
 - U.S. Application No. 12/714,204, filed Feb. 26, 2010, now U.S. Patent No. 7,834,586;
 - U.S. Application No. 12/905,934, filed Oct. 15, 2010, now U.S. Patent No. 7,986,127;

IPR2021-00395
Patent No. 7,239,111

- U.S. Application No. 13/175,487, filed on Jul. 1, 2011, now U.S. Patent No. 8,169,187;
- U.S. Application No. 13/175,509, filed Jul. 1, 2011, now U.S. Patent No. 8,232,766; and,
- U.S. Application No. 13/536,767, filed on Jun. 28, 2012, now U.S. Patent No. 8,624,550.

III. Lead and Back-Up Counsel

Lead Counsel	Back-up Counsel
Hong Annita Zhong (Reg. No. 66,530) IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067 Telephone: (310) 277-1010 Facsimile: (310) 203-7199 hzhong@irell.com FundamentalIPRs@irell.com	Jason Sheasby (<i>pro hac vice</i> to be requested) IRELL & MANELLA LLP 1800 Avenue of the Stars, Suite 900 Los Angeles, California 90067 Telephone: (310) 277-1010 Facsimile: (310) 203-7199 jsheasby@irell.com

IV. Service Information

The Patent Owner consents to electronic service by email to email addresses listed above and FundamentalIPRs@irell.com.

Dated: January 21, 2021

Respectfully submitted,

By: /s/ Hong Zhong
H. Annita Zhong. (Reg. No. 66,530)

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.