### 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.,

Petitioner

v.

FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC,

Patent Owner

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

Petitioner's Request For Rehearing Under 37 C.F.R. § 42.71(d)



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# TABLE OF AUTHORITIES

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KSR Int'l Co. v. Teleflex, Inc., 550 U.S. 398 (2007)	6
Merial Ltd. v. Virbac, IPR2014-01279, Paper 18 (Apr. 15, 2015)	3
PNY Techs., Inc. v. Phison Electronics Corp., IPR2013-00472, Paper 16 (April 23, 2014)	3
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# **Exhibits List**

Exhibit	Description
1001	U.S. Patent No. 7,239,111 (the "'111 Patent")
1002	U.S. Patent File History of the '111 Patent (the "'111 File History")
1003	Declaration of Dr. Jacob Baker regarding U.S. Patent No. 7,239,111 ("Baker")
1004	Curriculum Vitae of Dr. Jacob Baker
1005	U.S. Patent No. 6,130,518 ("Gabeheart")
1006	U.S. Patent Application Publication No. 2004/1215878 ("Veselic")
1007	U.S. Patent No. 6,936,936 (the "'936 Patent")
1008	U.S. Provisional Application No. 60/273,021 (the "'021 provisional")
1009	U.S. Provisional Application No. 60/330,486 (the "'486 provisional")
1010	Universal Serial Bus Specification, Revision 1.1, September 23, 1998 ("USB 1.1")
1011	Universal Serial Bus Specification, Revision 2.0, April 27, 2000 ("USB 2.0")
1012	U.S. Patent No. 6,531,845 ("Kerai")
1013	U.S. Patent No. 6,625,738 ("Shiga")
1014	U.S. Patent Application Publication No. 2003/0135766 ("Zyskowski")
1015	U.S. Patent No. 6,625,790 ("Casebolt")
1016	Cypress CY7C63722/23 CY7C63742/43 enCoReTM USB Combination Low-Speed USB & PS/2 Peripheral Controller, by Cypress Semiconductor Corporation, published May 25, 2000 ("Cypress")
1017	Japanese Patent Application No. 2000-165513A ("Morita")
1018	Amended Complaint, Fundamental Innovation Systems Int'l LLC v. TCT Mobile (US) Inc. et al., No. 1:20-cv-00552-CFC (D. Del. Sep. 11, 2020) ("Complaint")



Exhibit	Description
2001	Telephonic Hearing Transcript dated March 25, 2021
2002	U.S. Patent No. 7,360,004 ("Dougherty")
2003	Jan Axelson, USB Complete (1999), excerpt
2004	U.S. Patent No. 5,884,086 ("Amoni")
2005	U.S. Patent No. 6,904,488 ("Matusmoto")
2006	Jan Axelson, USB Complete (2d ed. 2001), excerpt
2007	U.S. Patent No. 5,859,522 ("Theobald")
2008	Reserved
2009	Declaration of Kenneth Fernald, Ph.D. in Support of Fundamental Innovation Systems International LLC's Patent Owner Preliminary Response ("Fernald")
2010	Claim construction order in <i>Fundamental Innovation Systems International LLC v. Samsung Electronics Co., Ltd.</i> , Case No. 2:17-cv-145-JRG-RSP, Dkt. No. 140 (E.D. Tex. Jan. 31, 2018)
2011	Claim construction order in <i>Fundamental Innovation Systems International LLC v. LG Electronics Inc.</i> , Case No. 2:16-cv-1425-JRG-RSP, Dkt. No. 146 (E.D. Tex. April 2, 2018)
2012	Claim construction order in <i>Fundamental Innovation Systems International LLC v. ZTE Corp. et al.</i> , Case No. 3:17-cv-1827-N, Dkt. No. 135 (N.D. Tex. Dec. 21, 2018)
2013	Claim construction order in <i>Fundamental Innovation Systems International LLC v. TCT Mobile (US), Inc.</i> , Case No. 20-cv-552-CFC-CJB, Dkt. No. 41 (D. Del. Feb. 12, 2021)
2014	IPR2018-00495 Petition
2015	IPR2021-00428 Petition



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