

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

GUI GLOBAL PRODUCTS, LTD.,
Patent Owner

Case IPR2021-00470
Patent 10,259,020

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I.	In multiple ways, Bohbot renders obvious a “switching device” “configured to activate, deactivate or send into hibernation the portable electronic device” and “an electronic circuit [of the electronic device] that is responsive to the switching device” (elements 1[a], 1[d], and 1[f]).	1
A.	Bohbot’s headset acts as a switching device to activate and deactivate discharging of power from the primary module’s power storage device.	2
B.	Bohbot’s headset acts as a switching device to activate and deactivate data transfer to, and storage at, the primary module’s data storage unit.	4
C.	Bohbot’s headset acts as a switching device to activate and deactivate the primary module’s microphone circuitry.	5
D.	Bohbot’s headset acts as a switching device to activate and deactivate the primary module.	6
II.	A POSITA would have modified Bohbot’s FIG. 3 based on FIG. 2.	7
III.	Bohbot-Gundlach renders obvious “the electronic device comprises...recessed areas...configured to correspond to complimentary surface elements on the switching device” and “when coupled, the second case [of the electronic device] functions to protect the first case [of the switching device]” (elements 1[e] and 1[g]).	8
IV.	Bohbot-Gundlach-Diebel renders obvious the “switching device is configured to activate, deactivate or send into hibernation the portable electronic device” (element 1[f]).	12
V.	Bohbot-Gundlach and Bohbot-Gundlach-Diebel renders obvious claim 6.	16
VI.	Bohbot-Gundlach and Bohbot-Gundlach-Diebel renders obvious claim 7.	18
VII.	Bohbot-Gundlach-Li and Bohbot-Gundlach-Diebel-Li render obvious claims 4 and 18.	19
VIII.	Bohbot-Gundlach-Stevinson and Bohbot-Gundlach-Diebel-Stevinson render obvious claims 8 and 9.	21
IX.	Bohbot-Gundlach-Stevinson-Iio and Bohbot-Gundlach-Diebel-Stevinson-Iio render obvious claim 17.	23
X.	CONCLUSION.	27

EXHIBITS

APPLE-1001	U.S. Patent No. 10,259,020 to Mayfield et al. (“the ’020 patent”)
APPLE-1002	Excerpts from the Prosecution History of the ’020 patent
APPLE-1003	Declaration of Dr. Jeremy Cooperstock
APPLE-1004	Certified English Translation of French Patent Publication No. FR2912858 to Bohbot
APPLE-1005	U.S. Patent Application Publication No. 2008/0132293 to Gundlach et al.
APPLE-1006	Certified English Translation of Chinese Patent Publication No. CN201114710Y to Li et al.
APPLE-1007	U.S. Patent Application Publication No. 2011/0317865 to Stevinson
APPLE-1008	U.S. Patent Application Publication No. 2003/0005558 to Wong
APPLE-1009	U.S. Patent Application Publication No. 2009/0014105 to Shattuck
APPLE-1010	U.S. Patent Application Publication No. 2011/0218502 to Iio et al.
APPLE-1011	U.S. Provisional Application No. 61/515,752
APPLE-1012	U.S. Provisional Application No. 61/555,310
APPLE-1013	U.S. Provisional Application No. 61/561,087
APPLE-1014	U.S. Provisional Application No. 61/568,031
APPLE-1015	U.S. Provisional Application No. 61/569,093

APPLE-1016 U.S. Provisional Application No. 61/576,834

APPLE-1017 U.S. Provisional Application No. 61/592,344

APPLE-1018 U.S. Provisional Application No. 61/619,229

APPLE-1019 U.S. Provisional Application No. 61/661,090

APPLE-1020 Certified English Translation of European Patent Publication No. EP2037661 to Ponticelli et al.

APPLE-1021 French Patent Publication No. FR2912858 to Bohbot

APPLE-1022 Chinese Patent Publication No. CN201114710Y to Li et al.

APPLE-1023 European Patent Publication No. EP2037661 to Ponticelli et al.

APPLE-1024 U.S. Patent No. 8,086,281 to Rabu et al.

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APPLE-1034 *AUDIO/VIDEO REMOTE CONTROL PROFILE* (Version 1.0 Adopted), Bluetooth Audio Video Working Group

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APPLE-1036 U.S. Patent Application Publication No. 2008/0070501

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APPLE-1038 *Voyager 855 Bluetooth Headset—User Guide*, Plantronics
Sound Innovation

APPLE-1039 *Jabra Sport—User Manual*, Jabra

APPLE-1040-1041 RESERVED

APPLE-1042 U.S. Patent No. 7,012,802

APPLE-1043 U.S. Patent Application Publication No. 2008/0167088

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APPLE-1045 *Advantages and Weaknesses of LED Application*, LEDinside,
https://web.archive.org/web/20121102080414/https://www.ledinside.com/knowledge/2007/12/Advantages_and_weaknesses_of_LED_Application_200712

APPLE-1046-1049 RESERVED

APPLE-1050 U.S. Publication No. 2008/0076489 to Rosener et al.

APPLE-1051 *Next-Generation Stereo Bluetooth Headsets*, TechHive,
https://www.techhive.com/article/162341/stereo_bluetooth_headsets.html

APPLE-1052-1058 RESERVED

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APPLE-1060 U.S. Patent Publication No. 2008/0298606 to Johnson et al.

APPLE-1061 RESERVED

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