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 10,589,320

PATENT OWNER'S SUR-REPLY TO PETITION FOR *INTER PARTES* REVIEW

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A. Bohbot does not render obvious a "switching device" "configured to activate, deactivate or send into hibernation the portable electronic device" (elements 1[a] and 1[d]). 3

1. Petitioner has not proven that Bohbot's headset "acts as a switching device to activate and deactivate discharging of power from the primary module's power storage device." 4

2. Petitioner has not proven that 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." 8

3. Petitioner has not proven that Bohbot's headset "acts as a switching device to activate and deactivate the primary module's microphone circuitry." 10

4. Petitioner has not proven that Bohbot's headset "acts as a switching device to activate and deactivate the primary module." 12

B. A POSITA would not have modified Bohbot's FIG. 3 based on FIG. 2 in the manner alleged by Petitioner. 14

C. Bohbot-Gundlach does not render obvious "the electronic device comprises...recessed areas...configured to correspond to complimentary surface

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H. Bohbot-Gundlach-Stevinson-Iio and Bohbot-Gundlach-Diebel- Stevinson-Iio do not render obvious claim 17. 26

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SAS Inst. Inc. v. Iancu, 138 S. Ct. 1348 (2018) 2

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EXHIBIT LIST

Exhibit 2001	Declaration of Hamid Toliyat, PhD
Exhibit 2002	CV of Hamid Toliyat, PhD
Exhibit 2003	Remote Deposition Transcript (Nov. 19, 2021), Dr. Jeremy Cooperstock, Ph.D.
Exhibit 2004	Remote Deposition Transcript (April 14, 2022), Dr. Jeremy Cooperstock, Ph.D.

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