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

U.S. Patent No. 7,834,586
Issue Date: November 16, 2010
Title: MULTIFUNCTIONAL CHARGER SYSTEM AND METHOD

Case No. IPR2021-00599

PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

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United States Patent and Trademark Office
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Alexandria, Virginia 22313–1450



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I.	INTI	RODUCTION1			
II.		PATENT OWNER'S ARGUMENTS FAIL FOR THREE INDEPENDENT REASONS			
	A.	Patent Owner's Arguments Are Legally Irrelevant Because The Challenged Claims Do Not Require Generating a SE1 Signal4			
		1. Patent Owner's Arguments Relate to Unclaimed Features5			
		2. The Prior Art Is Replete With Examples of Sending SE1 Signals To Identify a Power Source			
	В.	Even if the Claims Did Require Sending a SE1 Signal, It Would Be Obvious, and Patent Owner's Arguments to the Contrary Apply Legally Erroneous Standards for Obviousness			
		1. Morita Does Not Teach Away From Employing The SE1 Signal "Option"			
		2. PO Improperly Ignores The Collective Teachings of The Prior Art			
	C.	It Would Have Been Additionally Obvious for Morita's Charger to Send Morita's Phone a SE1 Signal in The Charge-Only Mode			
III.		PETITION DOES NOT USE THE 586 PATENT AS A ADMAP" TO ARRIVE AT THE SUBJECT MATTER OF THE			



TABLE OF AUTHORITIES

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Petitioners' Exhibit List

Exhibit	Description
1001	U.S. Patent No. 7,834,586 to Fischer et al., "Multifunctional Charger System and Method," filed Feb. 26, 2010 (the "'586 Patent")
1002	U.S. Patent File History of the '586 Patent (the "'586 File History")
1003	Declaration of Dr. Jacob Baker regarding U.S. Patent No. 7,834,586 ("Baker")
1004	Curriculum Vitae of Dr. Jacob Baker
1005	U.S. Patent No. 7,239,111 ("Fischer")
1006	U.S. Provisional Application No. 60/273,021 (the "'021 provisional")
1007	U.S. Provisional Application No. 60/330,486 (the "'486 provisional")
1008	Universal Serial Bus Specification, Revision 1.1, September 23, 1998 ("USB 1.1")
1009	Universal Serial Bus Specification, Revision 2.0, April 27, 2000 ("USB 2.0")
1010	U.S. Patent No. 6,531,845 ("Kerai")
1011	U.S. Patent No. 6,625,738 ("Shiga")
1012	U.S. Patent Application Publication No. 2003/0135766 ("Zyskowski")
1013	U.S. Patent No. 6,625,790 ("Casebolt")
1014	Cypress CY7C63722/23 CY7C63742/43 enCoRe [™] USB Combination Low-Speed USB & PS/2 Peripheral Controller, by Cypress Semiconductor Corporation, published May 25, 2000 ("Cypress enCoRe" or "Cypress Datasheet")
1015	Japanese Patent Application No. 2000-165513A ("Morita")
1016	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")
1017	U.S. Patent No. 6,668,296 ("Dougherty")
1018	U.S. Patent No. 5,923,146 ("Martensson")



Exhibit	Description
1019	Japanese Patent Application No. 2000-165513A ("Morita") with
	updated Certificate of Accuracy
1020	Japanese Patent Application No. 2000-165513A ("Morita") with
	corrected Certificate of Accuracy
1021	Deposition Transcript of Dr. Kenneth Fernald, taken on February
	18, 2022
1022	U.S. Des. Patent No. 353,371 ("Delhaes")
1023	U.S. Des. Patent No. 335,861 ("Tattari")
1024	U.S. Des. Patent No. 349, 899 ("Siddoway")
1025	U.S. Patent No. 6,708,278 ("Howard")
1026	Reply Declaration of Dr. Jacob Baker regarding U.S. Patent No.
	7,834,586 ("Baker Reply")
1027	IBM, Personal System/2, Model 95 XP 486, Technical Reference
	(1990)



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