

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' NOTICE OF FILING DEMONSTRATIVES

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Patent Trial and Appeal Board
United States Patent and Trademark Office
PO Box 1450
Alexandria, Virginia 22313-1450

TCT Mobile (US), Inc. et al.
Petitioner
v.
Fundamental Innovation Sys. Inter. LLC
Patent Owner

Case No. IPR2021-00599

TCT Mobile's Hearing Demonstrative

June 7, 2022

IPR2021-00599

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Roadmap

1. Unpatentability Ground and Remaining Issue
2. The 586 Patent and Claim 1
3. The Petition, Preliminary Response, and Institution Decision
4. PO's Arguments Are Irrelevant, Because Claim 1 Does Not Require Sending an Identification Signal
5. Even if Claim 1 Did Require Sending an Identification Signal, PO's Arguments Are Irrelevant for Two Separate Reasons:
 - A. It Would Have Been Obvious to Send an Identification Signal When the Morita S
 - B. It Would Have Been Obvious to Send an Identification Signal When the Morita S Normal Charger
6. The Petition Does Not Use Hindsight

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4. PO's Arguments Are Irrelevant, Because Claim 1 Does Not Require Sending an Identification Signal
5. Even if Claim 1 Did Require Sending an Identification Signal, PO's Arguments Fail for Two Separate Reasons:
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Unpatentability Ground and Remaining Issue

- The Petition advances single obviousness ground:

Ground	Claims	Basis	Referen
1	1-2 and 8-9	pre-AIA 35 U.S.C. § 103(a)	Morita a knowled POSITA

- PO argues only that Morita and the knowledge of a POSITA does not render the single limitation—“configured to detect an identification signal.”

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