#### 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 IPR2021-00599 Patent No. 7,834,586

## FUNDAMENTAL INNOVATION SYSTEMS INTERNATIONAL LLC's PATENT OWNER PRELIMINARY RESPONSE

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VII.	The Petition's Translation of Morita Does Not Comply With Patent Office Rules			
VIII.	Petitioner Has Not Shown A Reasonable Likelihood Of Success To Prevail On At Least One Challenged Claims On Ground 1			



A.	Because SE1 Would Disrupt USB Communication And Enumeration, Petitioner's Proposed Combination Would Render Morita Inoperable for Its Intended Purpose			
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### **TABLE OF AUTHORITIES**

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## **EXHIBIT LIST**

Ex. 2001	Telephonic Hearing Transcript dated March 25, 2021
Ex. 2002	U.S. Patent No. 7,360,004 ("Dougherty")
Ex. 2003	Jan Axelson, USB Complete (1999), excerpt
Ex. 2004	U.S. Patent No. 5,884,086 ("Amoni")
Ex. 2005	U.S. Patent No. 6,904,488 ("Matusmoto")
Ex. 2006	Jan Axelson, USB Complete (2d ed. 2001), excerpt
Ex. 2007	U.S. Patent No. 5,859,522 ("Theobald")
Ex. 2008	U.S. Patent No. 6,556,564 ("Rogers")
Ex. 2009	Declaration of Kenneth Fernald, Ph.D. in Support of Fundamental Innovation Systems International LLC's Patent
	Owner Preliminary Response
Ex. 2010	Claim construction order in Fundamental Innovation Systems International LLC v. Samsung Electronics Co., Ltd., Case No. 2:17-cv-145-JRG-RSP, Dkt. No. 140 (E.D. Tex. Jan. 31, 2018)
Ex. 2011	Claim construction order in Fundamental Innovation Systems International LLC v. LG Electronics Inc., Case No. 2:16-cv- 1425-JRG-RSP, Dkt. No. 146 (E.D. Tex. April 2, 2018)
Ex. 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)
Ex. 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)



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