

Petition for *Inter Partes* Review of U.S. Patent No. 9,880,715
(IPR2021-00786)

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES) INC.
Petitioner

v.

LITL LLC
Patent Owner

IPR Case No. IPR2021-00786
U.S. Patent No. 9,880,715

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. §311 *ET SEQ.* AND 37 C.F.R. §42.100 *ET SEQ.*
(CLAIMS 1-20 OF U.S. PATENT NO. 9,880,715)**

EXHIBIT LIST

EXHIBIT	DESCRIPTION
1001	U.S. Pat. No. 9,880,715 ("the '715 Patent")
1002	Prosecution History of the '715 Patent
1003	JP 1994-242856 to Shimura
1004	Certified English translation of JP 1994-242856 ("Shimura")
1005	U.S. Pub. No. 2005/0062715 to Tsuji et al. ("Tsuji")
1006	Windows XP Home Edition: The Missing Manual (2nd Edition) ("Pogue")
1007	Declaration of Jean Ward
1008	Curriculum Vitae of Jean Ward
1009	Claim Listing
1010	U.S. Pub. No. 2008/0059888 to Dunko ("Dunko")
1011	U.S. Pub. No. 2006/0034042 to Hisano et al. ("Hisano")
1012	U.S. Pub. No. 2005/0122318 to Tonouchi et al. ("Tonouchi")
1013	JP 2002-258982 to Kiyoyuki
1014	Certified English translation of JP 2002-258982 ("Kiyoyuki")
1015	JP 1996-179851 to Shigeo
1016	Certified English translation of JP 1996-179851 ("Shigeo")
1017	DE 1031455A1 to Schweizer
1018	Certified English translation of DE 1031455A1 ("Schweizer")

Petition for *Inter Partes* Review of U.S. Patent No. 9,880,715
(IPR2021-00786)

EXHIBIT	DESCRIPTION
1019	Clifford & Gomez, Measuring Tilt with Low-g Accelerometers (2005) ("Freescale")
1020	U.S. Pat. No. 6,493,216 to Lin ("Lin")
1021	U.S. Pat. No. 8,151,105 to Park et al. ("Park")
1022	Ride, MIT's \$100 Laptop (2005) ("MIT")
1023	U.S. Pat. No. 6,882,335 to Saarinen ("Saarinen")
1024	Panasonic CF-19 Operating Instructions
1025	Panasonic CF-T8 Operating Instructions
1026	Hardy, Lenovo ThinkPad X61 Tablet PC Review (2007)
1027	Lenovo ThinkPad X61 Tablet Service and Troubleshooting Guide
1028	Dell Latitude XT Tablet
1029	Motion Computing M1400 Tablet PC User Guide
1030	Motion Computing M1400 Tablet PC Addendum
1031	HP Compaq Tablet PC TC1100 QuickSpecs
1032	Sony Vaio VGN-UX280P (UX Series MicroPC) Spec Sheet
1033	Declaration of Michael J. Hopkins
1034	Declaration of Liliana Nunez
1035	WaybackMachine Archive of https://www.windows-help-central.com/show-desktop-icon-in-xp-missing.html
1036	Excerpts of Windows XP Hacks & Mods: For Dummies
1037	Excerpts of Windows XP in a Nutshell (2nd Edition)

Petition for *Inter Partes* Review of U.S. Patent No. 9,880,715
(IPR2021-00786)

EXHIBIT	DESCRIPTION
1038	U.S. Pat. No. 5,559,670 (“Flint”)

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. MANDATORY NOTICES UNDER 37 C.F.R. §42.8.....	2
A. Real Parties-In-Interest (§42.8 (b)(1)).....	2
B. Related Matters (§42.8 (b)(2))	2
C. Lead and Backup Counsel (§42.8 (b)(3)).....	2
D. Service Information (§42.8 (b)(4)).....	2
III. FEE FOR <i>IPR</i> (37 C.F.R. §42.15(a) and §42.103)	3
IV. REQUIREMENTS FOR <i>IPR</i> UNDER 37 C.F.R. §42.104.....	3
A. Grounds for Standing (§42.104(a)).....	3
B. Identification of Challenged Claims (§42.104(b)(1))	3
C. Grounds of Challenge (§42.104(b)(2))	3
V. PROPOSED GROUNDS SHOULD NOT BE DENIED INSTITUTION ON ANY DISCRETIONARY GROUND	4
A. The Three References Were Not "Presented to the Office"	4
B. Even If a Reference Was "Presented to the Office," the Office Made a Material Error by Overlooking Its Impact.....	6
VI. RELEVANT INFORMATION CONCERNING THE '715 PATENT	7
A. Overview of the '715 Patent	7
B. Prosecution History of the '715 Patent	13
C. Level of Ordinary Skill in the Art	14
D. Claim Listing.....	14
VII. CLAIM CONSTRUCTION—37 C.F.R. §42.104 (b)(3)	15
A. "execution component"	15
1. [1e], [17d], and [20e]	16
2. [1f], [17e], [20f]	19
3. [8].....	22
4. [13].....	23

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.