UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC., Petitioner
v.
LOGANTREE LP, Patent Owner
Case IPR2022-00037 Patent 6,059,576

### PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



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	A. Ono-Hutchings renders obvious "a movement sensor" as recited in elements [1a] and [1k] and a "movement measuring device" as recited in element [20a]	
	1. A POSITA would have been motivated to implement Ono's device with multidimensional accelerometers/velocity sensors and rotational sensors as suggested by Hutchings	
	2. Apple has shown by the preponderance of the evidence that Ono-Hutchings teaches the claimed "movement sensor" and "movement measuring device"	
	B. Ono renders elements [1f], [20f], [30], [41], and [42] obvious8	
	1. Ono teaches "storing first event information related to the detected first user-defined event" (elements [1f], [20f]) and "first event information indicating that the predetermined threshold is met" (claim 41)	
	2. Ono teaches storing first event information "along with first time stamp information reflecting a time at which the movement data causing the first user-defined event occurred" (elements [1f], [20f]), storing "date information associated with the first time stamp information" (claim 30), and storing "the first time stamp information in association with said first event information" (claim 42)	
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#### **EXHIBITS**

APPLE-1001	U.S. Patent No. 6,059,576 to Brann. ("the '576 Patent")
APPLE-1002	Prosecution History of the '576 Patent ("the Prosecution History")
APPLE-1003	[RESERVED]
APPLE-1004	Complaint, Logantree LP, v. Apple, Inc., 6:21-cv-00397, W.D. Tex., Apr. 23, 2021
APPLE-1005	Stipulation by Petitioner
APPLE-1006	Ex Parte Reexamination Certificate of U.S. Patent No. 6,059,576
APPLE-1007	Excerpts from <i>Ex Parte</i> Reexamination No. 90/013,201 Prosecution History
APPLE-1008	[RESERVED]
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APPLE-1010	U.S. Patent No. 5,573,013 ("Conlan")
APPLE-1011	[RESERVED]
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APPLE-1014	U.S. Patent No. 5,803,740 ("Gesink")
APPLE-1015-102	3 [RESERVED]
APPLE-1024	Scheduling Order, <i>Logantree LP</i> , v. Apple, Inc., 6:21-cv-00397, W.D. Tex., Aug. 13, 2021



APPLE-1025	"2021 Discretionary Denials Have Passed 100, But Are Slowing," Dani Krass, Law360, July 21, 2021
APPLE-1026-102	8 [RESERVED]
APPLE-1029	"Leahy And Cornyn Introduce Bipartisan Bill To Support American Innovation And Reduce Litigation", Sep. 29, 2021, available at: <a href="https://www.leahy.senate.gov/press/leahy-and-cornyn-introduce-bipartisan-bill-to-support-american-innovation-and-reduce-litigation">https://www.leahy.senate.gov/press/leahy-and-cornyn-introduce-bipartisan-bill-to-support-american-innovation-and-reduce-litigation</a>
APPLE-1030	Restoring the America Invents Act, S. 2891, 117 <sup>th</sup> Cong. (2021).
APPLE-1031	Complaint, Logantree LP, v. Fitbit Inc., 2:15-cv-01575, E.D. Tex., Oct. 2, 2015
APPLE-1032	Complaint, <i>Logantree LP</i> , v. <i>Garmin International, Inc.</i> , 5:17-cv-00098, W.D. Tex., Feb. 10, 2017
APPLE-1033	Complaint, Logantree LP, v. Garmin International, Inc., 6:17-cv-01217, D. Kan., Aug. 23, 2017
APPLE-1034	Complaint, Logantree LP, v. Omron Healthcare, Inc., 1:18-cv-01617, D. Del., Oct. 18, 2018
APPLE-1035	Complaint, Logantree LP, v. Misfit, Inc., 1:21-cv-00385, D. Del., Mar. 16, 2021
APPLE-1036	Complaint, Logantree LP, v. Huawei Technologies Co., Ltd, 6:21-cv-00119, E.D. Tex., Mar. 25, 2021
APPLE-1037	Complaint, Logantree LP, v. LG Electronics, Inc., 4:21-cv-00332, E.D. Tex., Apr. 27, 2021
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