

TABLE OF CONTENTS

I.	RESERVATIONS	2
A.	General Reservations	2
B.	Ongoing Discovery	3
C.	Claim Construction	5
D.	Plaintiff's Infringement Contentions	6
E.	The Intrinsic Record	7
F.	Rebuttal Evidence	8
G.	Contextual Evidence	8
H.	Invalidity Under Section 102(f) Prior Art.....	9
I.	Priority and Effective Filing Date.....	9
J.	No Patentable Weight	10
II.	INVALIDITY UNDER 35 U.S.C. §§ 102-103.....	10
A.	Summary of Prior Art	11
B.	Summary of Motivation for Combining Identified Prior Art	12
C.	Secondary Considerations.....	17
III.	THE '759 PATENT.....	19
A.	Identification of Prior Art	19
1.	Prior Art Patents, Patent Applications, and Patent Publications.....	20
2.	Prior Art Publications	21
3.	Prior Art Systems.....	21
B.	Bases for Anticipation and/or Obviousness.....	22
1.	Obviousness Combinations.....	24
2.	Motivation to Combine.....	25
IV.	THE '514 PATENT.....	36

A.	Identification of Prior Art	37
1.	Prior Art Patents, Patent Applications, and Patent Publications.....	37
2.	Prior Art Publications	38
3.	Prior Art Systems.....	39
B.	Bases for Anticipation and/or Obviousness.....	40
1.	Obviousness Combinations.....	41
2.	Motivation to Combine.....	42
V.	THE '399 PATENT.....	48
A.	Identification of Prior Art	48
1.	Prior Art Patents, Patent Applications, and Patent Publications.....	49
2.	Prior Art Publications	50
3.	Prior Art Systems.....	50
B.	Bases for Anticipation and/or Obviousness.....	51
1.	Obviousness Combinations.....	52
2.	Motivation to Combine.....	53
VI.	THE '489 PATENT.....	60
A.	Identification of Prior Art	60
1.	Prior Art Patents, Patent Applications, and Patent Publications.....	60
2.	Prior Art Systems.....	61
B.	Bases for Anticipation and/or Obviousness.....	63
1.	Obviousness Combinations.....	64
2.	Motivation to Combine.....	65
VII.	INVALIDITY UNDER 35 U.S.C. § 112.....	77
A.	Lack of Enablement and/or Written Description Under 35 U.S.C. § 112 ¶	
(1).....		78
1.	The '759 Patent.....	80

2.	The '514 Patent	81
3.	The '399 Patent	81
B.	Indefiniteness Under 35 U.S.C. § 112 ¶ (2)	82
1.	The '759 Patent	83
2.	The '514 Patent	83
3.	The '399 Patent	84
4.	The '489 Patent	84
C.	Improper Dependency Under 35 U.S.C. § 112 ¶ (4)	85
1.	The '759 Patent	86
2.	The '489 Patent	86
D.	Governed by 35 U.S.C. § 112 ¶ (6) and Lacking Corresponding Structure	86
1.	The '759 Patent	87
2.	The '514 Patent	87
VIII.	ACCOMPANYING DOCUMENT PRODUCTION	88

Pursuant to the Court’s Scheduling Order (Dkt. 20) and the Court’s Order Governing Proceedings – Patent Case (“OGP”), Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, LLC, Dell Technologies Inc., and Dell Inc. (collectively, “Defendants”) provide Plaintiff MyPAQ Holdings Ltd. (“Plaintiff”) with notice of Defendants’ Preliminary Invalidation Contentions. These contentions are with respect to the claims identified in Plaintiff’s Preliminary Infringement Contentions, dated November 3, 2021 to Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, LLC (collectively, “Samsung”), and Plaintiff’s Preliminary Infringement Contentions, dated November 29, 2021 to Defendants Dell Technologies Inc. and Dell Inc., (collectively “Dell”) (collectively, “Infringement Contentions”).

Plaintiff asserts that Samsung infringes the following claims:

- Claims 1-3, 6, 11-13, 16, and 19 of U.S. Pat. No. 7,675,759 (“the ’759 Patent”);
- Claims 1-3, 5-8, 10-12, 15-17, and 20 of U.S. Pat. No. 8,477,514 (“the ’514 Patent”);
- Claims 1, 2, 4-6, 10, and 13 of U.S. Pat. No. 7,403,399 (“the ’399 Patent”); and
- Claims 1, 4-9, 11, 12, 22, 25-30, 32, 33, 39, 42, 43, 46-51, 53, 54, 60, and 63 of U.S. Pat. No. 7,978,489 (“the ’489 Patent”).

Samsung contends that all such claims are invalid for the reasons described below.

Plaintiff asserts that Dell infringes the following claims:

- Claims 1, 2, 6, 11, and 16 of the ’759 Patent; and
- Claims 1-3, 5-8, 10-12, 14-17, and 19-20 of the ’514 Patent.

Dell contends that all such claims are invalid for the reasons described below.

As used in these Preliminary Invalidation Contentions, “Asserted Claims” include any and all claims asserted against the Defendants. Defendants’ submission of a common set of Preliminary Invalidation Contentions across multiple cases shall not be misconstrued as a concession

MyPAQ, Exhibit 2001

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.