

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND DELL TECHNOLOGIES INC.
Petitioners

v.

MYPAQ HOLDINGS LTD.
Patent Owner

Case No. IPR2022-00311
Patent 8,477,514

PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,477,514

TABLE OF CONTENTS

I. MANDATORY NOTICES1

II. STANDING AND FEES.....3

III. OVERVIEW OF THE '514 PATENT3

 A. Subject Matter3

 B. Prosecution History.....5

IV. SUMMARY OF PRIOR ART6

 A. *Chagny* (EX1004)6

 B. *Hwang* (EX1006)7

V. SUMMARY OF GROUNDS8

VI. LEVEL OF ORDINARY SKILL.....9

VII. CLAIM CONSTRUCTION9

VIII. INSTITUTION IS PROPER9

 A. Institution is Proper Under 35 U.S.C. § 314(a)9

 B. Institution is Proper Under 35 U.S.C. § 325 (d)12

IX. GROUND 1A: *Chagny* Anticipates Claims 1-12, 14-17, and 19-20.....13

 A. Claim 113

 B. Claim 220

 C. Claim 322

 D. Claim 423

 E. Claim 524

 F. Claim 624

 G. Claim 728

 H. Claim 828

 I. Claim 928

 J. Claim 1029

 K. Claim 1129

 L. Claim 1236

 M. Claim 1437

 N. Claim 1537

O.	Claim 16.....	38
P.	Claim 17.....	39
Q.	Claim 19.....	39
R.	Claim 20.....	39
X.	GROUND 1B: <i>Chagny</i> in View of the Knowledge of POSITA Renders Obvious Claims 1-20.....	40
A.	Claims 1-5	40
B.	Claims 6-12 and 14-15.....	40
C.	Claims 11-12, 14-17, 19-20	42
D.	Claims 13 and 18.....	43
XI.	GROUND 2A: <i>Hwang</i> Anticipates Claims 1-10, 16-17, and 19-20.....	45
A.	Claim 1	45
B.	Claim 2.....	50
C.	Claim 3.....	54
D.	Claim 4.....	55
E.	Claim 5.....	56
F.	Claim 6.....	56
G.	Claim 7.....	60
H.	Claim 8.....	61
I.	Claim 9.....	61
J.	Claim 10.....	61
K.	Claim 16.....	61
L.	Claim 17.....	68
M.	Claim 19.....	69
N.	Claim 20.....	69
XII.	GROUND 2B: <i>Hwang</i> in view of <i>Chagny</i> Renders Obvious Claims 11-12, 14-17, and 19-20	69
A.	Motivation to Combine	69
B.	Claim 11	72
C.	Claim 12.....	80
D.	Claim 14.....	81

E. Claim 15	81
F. Claims 16-17 and 19-20.....	81
XIII. GROUND 2C: <i>Hwang</i> in view of the knowledge of a POSITA Renders Obvious Claim 18	82
A. Claim 18.....	82
XIV. GROUND 2D: <i>Hwang</i> in view of <i>Chagny</i> and the Knowledge of a POSITA Renders Obvious Claims 13 and 18.....	84
A. Claims 13 and 18.....	84
XV. CONCLUSION	84

LIST OF EXHIBITS

1001	U.S. Patent No. 8,477,514 by Artusi et al. (“the ’514 Patent”)
1002	Expert Declaration of Dr. Sayfe Kiaei
1003	Excerpts of the ’514 Patent File History
1004	U.S. Patent No. 6,873,136 to Chagny (“Chagny”)
1005	Reserved
1006	U.S. Patent Application Publication No. 2004/0174152 to Hwang et al. (“Hwang”)
1007	U.S. Patent No. 6,748,545 to Helms (“Helms”)
1008	Comparisons of Claims 11-15 to 16-20 of the ’514 Patent
1009	Ned Mohan et al., <i>Power Electronics: Converters, Applications, and Design</i> (John Wiley & Sons, Inc., New York, 2d Ed. 1995)
1010	MyPAQ’s Preliminary Infringement Contentions, Exhibit 16, served in <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1011	MyPAQ’s Preliminary Infringement Contentions, Exhibit 21, served in <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1012	Alan Grebene, <i>Bipolar and MOS Analog Integrated Circuit Design</i> (John Wiley & Sons, Inc., 1984) (“Grebene”)
1013	MyPAQ’s Preliminary Infringement Contentions, served in <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1014	<i>MyPAQ Holdings Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , No. 21-cv-00398, Dkt. 40 (W.D. Tex. Nov. 29, 2021) (“Scheduling Order”)
1015	S.A. Money, <i>Microprocessor Data Book</i> (Academic Press, Inc., 2 nd ed. 1990)

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.