SKIERMONT DERBY LLP
Dallas · Los Angeles

GRAVES & SHAW LLP

PATENT OWNER'S DEMONSTRATIVE EXHIBITS

SEPTEMBER 15, 2023

ORAL ARGUMENT

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC., AND APPLE INC.

v.

SMART MOBILE TECHNOLOGIES LLC

U.S. PATENT NO. 9,614,943 B1

IPR2022-01004

PHILIP J. GRAVES, COUNSEL FOR PATENT OWNER

Table Of Contents

- Byrne Grounds
  - Byrne Does Not Disclose A Processor That Processes First and Second Data Stream
  - Byrne Does Not Disclose A Processor That Processes Data Streams In Parallel
- Byrne-Raleigh Grounds
  - Raleigh Does Not Disclose A Processor That Processes First And Second Data Stream
  - Raleigh Does Not Disclose First And Second Data Streams That Are Processed By The Processors

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

A Processor That Comprises Multiple Channels And Is Configured To Process First And Second Data Streams In Parallel

1. A wireless communication device comprising:
a plurality of antennas; and
a communication component coupled to the plurality of antennas, the communication component including a processor, a transmitter, and a receiver,
wherein the communication component is configured to communicate via a first frequency band using a wireless communication protocol; and
wherein one or more subtasks are assigned to one or more channels, and the one or more channels are sampled and clocked individually; and
wherein the processor comprises multiple ones of the one or more channels and is further configured to process a first data stream and a second ...

wherein the processor comprises multiple ones of the one or more channels and is further configured to process a first data stream and a second data stream in parallel.

5. A wireless communica...
a plurality of antennas; a...
a communication compo...
antennas, the communication component including a processor, a transmitter, and a receiver,
wherein the communication component includes at least one additional transmitter;
wherein the transmitter is configured to transmit on a first frequency and the at least one additional transmitter is configured to transmit on a second frequency;
wherein the transmitter is configured to transmit using a first communication protocol and the at least one additional transmitter is configured to transmit using a second communication protocol, wherein the first communication protocol is different than the second communication protocol; and
wherein one or more subtasks are assigned to one or more channels, and the one or more channels are sampled and clocked individually; and
wherein the processor comprises multiple ones of the one or more channels and is further configured to process a first data stream and a second data stream in parallel.

8. A wireless communication d...
a plurality of antennas; and
a communication component c...
antennas, the communication...
processor, a transmitter, and...
wherein the communication co...
one additional receiver;
wherein the receiver is configur...
communication protocol and...
receiver is configured to rec...
munication protocol, wherei...
protocol is different than the...
protocol; and
wherein one or more subtasks ar...
the one or mo...
dividually; an...
ssor comprise...
ls and is furth...
m and a secon...

device comp...
a communication component coupled to the...
antennas, the communication component...
processor, a transmitter, and a receiver,
wherein a first set of antennas of the plurali...
is configured to operate in a first frequenc...
second set of antennas of the plurality o...
configured to operate in a second freq...
wherein the first frequency band is diffe...
second frequency band;
wherein the first set of antennas of the...
antennas is configured to operate using a...
nication protocol and the second set of an...
plurality of antennas is configured to ope...
second communication protocol, wherein...
munication protocol is different than the...
munication protocol; and
wherein one or more subtasks are assigned t...
channels, and the one or more channels...
and clocked individually; and
wherein the processor comprises multiple o...
or more channels and is further configured...
first data stream and a second data strea...

The Petition v. Byrne's Disclosure

Petitioner's Argument

EX-1008, Figure 2
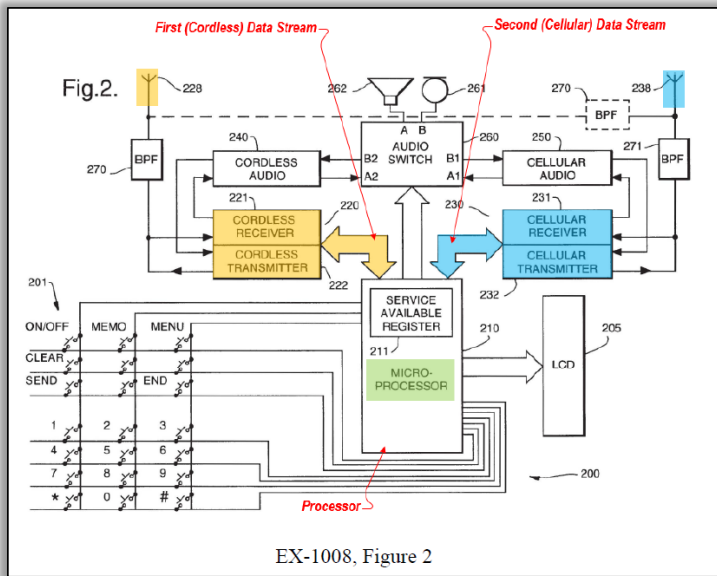
Actual Signal Flow
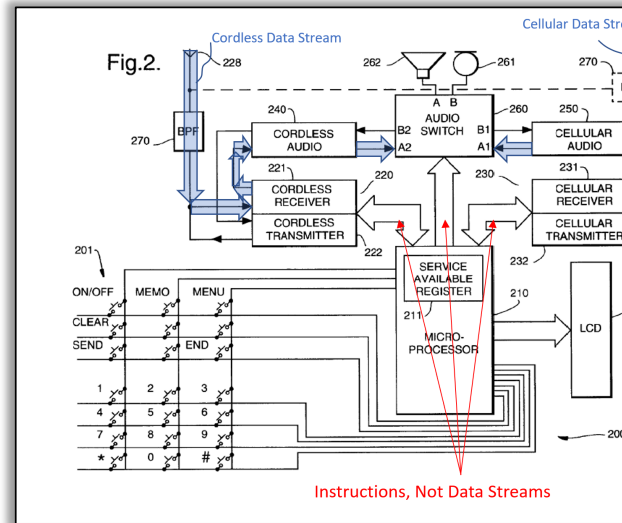
The data from the antennas does not touch the processor

# Petitioner Points To The Signals Received Over Byrne's Antennas As The First And Second Data Streams
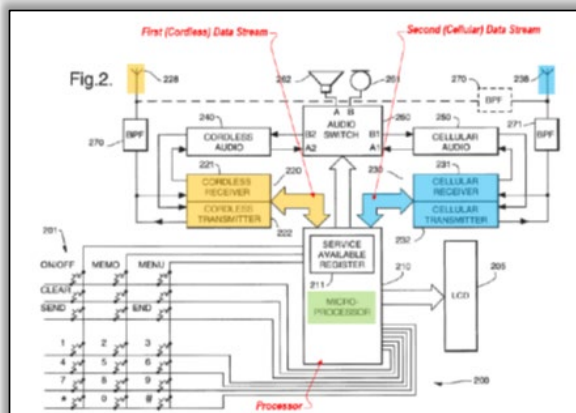
EX-1008, Figure 2

Further, Byrne's telephone operates "*simultaneously* as a cellular telephone and a cordless telephone" "such that both cellular and cordless operations *are in progress at the same time*." EX-1008, 8:2-15. Therefore, a POSITA would have understood or found obvious that, when "both cellular and cordless operations are in progress at the same time," microprocessor 210 processes the cordless data stream (*first data stream*) and the cellular data stream (*second data stream*) in par-allel. *Id.*; EX-1003, ¶87. Further, to the extent that the *processor* in this element
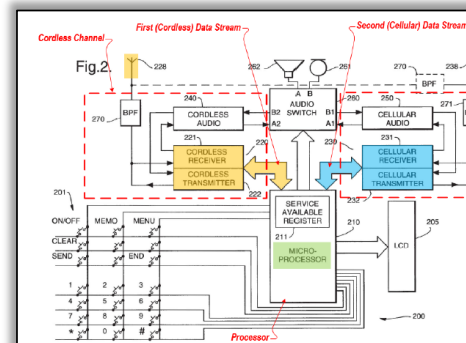
EX-1008, Figure 2 (annotated)

87. In addition, referring to Figure 2 above, Byrne's telepho "simultaneously as a cellular telephone and a cordless telephone" "su cellular and cordless operations are in progress at the same time." EX 15. Therefore, because Byrne's telephone is "so arranged such that be and cordless operations are in progress at the same time," a POSITA understood or found obvious that, referring to Figure 2 above, the mi 211 is configured to process the cordless data stream (corresponding stream) and the cellular data stream (corresponding to a second data s parallel to ensure "both cellular and cordless operations are in progre time." *Id.* Additionally, to the extent that the processor in this elemen

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

DOCKET ALARM

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.