UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., and APPLE INC., Petitioner,

v.

SMART MOBILE TECHNOLOGIES LLC, Patent Owner.

Case IPR2022-01248
Patent 8,842,653

PATENT OWNER'S RESPONSE



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PRO	OVE I	BOARD HAS THRICE FOUND, PETITIONER FAILS TO TS COMBINATIONS DISCLOSE OR RENDER OBVIOUS PLEXED" "SIGNALS" (CLAIMS 1-13, 27-30; GROUNDS	
1B,	1 D)	1	
A.	Disc	Board Correctly Found That Petitioner's Grounds Do Not close Or Render Obvious "Multiplexed" "Signals" In Three carate Cases.	
B.	Petitioner Fails To Show That Yegoshin Discloses Or Renders Obvious The Claimed "Multiplexed" "Signals."		
	1.	As The Board Correctly Found, Petitioner Fails To Meet Its Burden To Show Inherency Or Single Reference Obviousness	
	2.	As The Board Correctly Found, Yegoshin Does Not Teach "Simultaneously" Using Cellular And WLAN Signals Or Otherwise Disclose "Multiplexing."	
	3.	Petitioner Does Not Demonstrate That Yegoshin Multiplexes Under Any Construction, Including Petitioner's District Court Construction	
C.	Petitioner Fails To Show That The Combination Of Yegoshin And Bernard Renders Obvious The Claimed "Multiplexed" Signals.		
	1.	Petitioner Does Not Prove That Bernard Discloses The Claimed "Multiplexing."	
	2.	Petitioner Fails To Prove A POSITA Would Be Motivated To Modify Yegoshin/Johnston/ Billström In View Of Bernard To Satisfy The Claimed "Multiplexing."27	



		a.	A POSITA Would Not Be Motivated To Connect Yegoshin's Cell Phone To Bernard's Cradle To Disclo The Claims.			
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IV.	OR	RENDER (FAILS TO PROVE ITS COMBINATIONS DISCLOD DISCLODI DISCLO			
	A.		Fails To Explain How Yegoshin's Device Would Use Idresses	50		
	В.		Yegoshin To Implement Billström's Cellular Network ve Been Beyond The Skill Of A POSITA	54		
V.	CO	NNECTED	FAILS TO SHOW "TWO NETWORK PATHS" TO THE SAME "SERVER" (CLAIMS 27-30;	60		
VI.	PETITIONER ADDITIONALLY FAILS TO SHOW THAT MULTIPLE DEPENDENT CLAIMS ARE DISCLOSED OR RENDERED OBVIOUS (CLAIMS 2, 9, 10, 21, AND 26; GROUNDS 1B AND 1D)					
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	B.	Claim 9		.64		
	C.	Claim 10		.65		
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