

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 OBJECTIONS TO PETITIONER'S
DEMONSTRATIVE EXHIBITS**

Patent Owner hereby submits its objections to Petitioner’s demonstrative exhibits.

Slide 80:

The statement boxed in red is a portion of Petitioner’s expert declaration (Exhibit 1051, [40]) which was improperly incorporated by reference into Petitioner’s Reply (at 20), and for the first time maps the claims’ “multiplexed” signals to the functionality of “application server 710” on Bernard’s PDA, in contrast to the Petition (at 31-38) and the Reply (at 18-21) which expressly mapped that functionality to the “communication server 750” on Bernard’s cradle.

The Yegoshin-Bernard Combination Renders Obvious The “Multiplex” Limitations

Dr. Jensen Petitioner’s Reply, 20-21

40. From these teachings, a POSITA would have readily understood and found obvious that the foregoing communications through the single serial interface 701 would employ “multiplexing” of the data packets, regardless of the timing of each data packet’s arrival at the serial interface 701. EX-1050, ¶¶26-33. Consistent with the well-known understanding of multiplexing (§IV.A.1), Bernard’s application server 710 multiplexes data packets from one or more applications to one or multiple communication circuits over the single serial interface 701. EX-1050, ¶¶26-33. Similarly, as illustrated in Figure 12 (below), Bernard’s communication server 750 multiplexes data packets from multiple communication circuits and transfers them over the single serial interface 701, which are delivered to one or more appropriate applications. EX-1050, ¶¶26-33. Nowhere does Bernard require that such data packets be simultaneously received or transmitted through multiple emulators 756, 758, 760, 762 and communication circuits 114, 120, 124, 126 in order for the data packets to be multiplexed over the serial interface 701. EX-1050, ¶¶26-33.

FISH. EX-1051 (2nd Jensen Decl.), [40] 80

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Slides 86 and 95:

The statement boxed in red is Petitioner’s expert declaration (Exhibit 1051, [53]) providing approximately 100 words of numerical analysis based on Exhibit 1058, both of which are incorporated by reference in Petitioner’s Reply and not discussed there in any meaningful way, if at all. *See* Sur-Reply, 30-31.

Patent Owner’s Argument Has No Impact

Petitioner’s Reply, 22-23

Dr. Jensen

analysis or is not technically reasonable in the context of Bernard. In particular, whether or not such a parallel bus would be needed depends on the capabilities of the radios and the communication interface. Around the Critical Date, the data handling capabilities of serial wireline communications notably exceeded the data rates supported by most wireless data connections, weakening Dr. Cooklev’s arguments. If Dr. Cooklev is suggesting that a “parallel interface” means one interface

EX-1051 (2nd Jensen Decl.), [45]

53. For example, RS-485 is a serial standard released before 1999. EX-1058, 1. This standard accommodates data rates of up to 10 Mbit/second. *Id.* IEEE 802.11 WLAN (1997) supported up to 2 Mbit/second, and 802.11b WLAN (1999) supported up to 11 Mbit/second, although the rate that an application would see was lower, as some of this bandwidth was used for the radio networking packet headers. EX-1059, 1, 3. GPRS, a cellular standard for data over the GSM network, accommodated data rates of 56-114 kbit/second. EX-1060, 1. Therefore, a 10 Mbit/second RS-485 serial interface had capacity to multiplex multiple data streams from the radios available.

EX-1051 (2nd Jensen Decl.), [53] 86

FISH. DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Sufficient Motivation Exists For Combining Yegoshin and Bernard

Petitioner’s Reply, 26

Dr. Jensen

17:51-59, Figure 10; EX-1035, 47:15-21. Indeed, serial interfaces were well-known to be used for various internal and external connections as simple and cost-efficient connection solutions for a sufficient data transfer rate required for data communication or bandwidth before the Critical Date.

EX-1051 (2nd Jensen Decl.), [52]

53. For example, RS-485 is a serial standard released before 1999. EX-1058, 1. This standard accommodates data rates of up to 10 Mbit/second. *Id.* IEEE 802.11 WLAN (1997) supported up to 2 Mbit/second, and 802.11b WLAN (1999) supported up to 11 Mbit/second, although the rate that an application would see was lower, as some of this bandwidth was used for the radio networking packet headers. EX-1059, 1, 3. GPRS, a cellular standard for data over the GSM network, accommodated data rates of 56-114 kbit/second. EX-1060, 1. Therefore, a 10 Mbit/second RS-485 serial interface had capacity to multiplex multiple data streams from the radios available.

EX-1051 (2nd Jensen Decl.), [53] 95

FISH. DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Respectfully submitted,

Date: October 23, 2023

/ Parham Hendifar /

Kenneth J. Weatherwax, Reg. No. 54,528

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LOWENSTEIN & WEATHERWAX LLP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the following documents were served by electronic service, by agreement between the parties, on the date signed below:

PATENT OWNER'S OBJECTIONS TO PETITIONER'S DEMONSTRATIVE EXHIBITS

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/ Colette Woo /

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