### 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 PRELIMINARY RESPONSE

# **TABLE OF CONTENTS**

## Page

I.	INTRODUCTION1		
II.	FAI	E PETITION SHOULD BE DENIED FOR PETITIONER'S LURE TO DISCLOSE OR APPLY ITS DISTRICT COURT AIM CONSTRUCTIONS (ALL CLAIMS, ALL GROUNDS)4	
	A.	Petitioner's District Court And IPR Claim Construction Positions Are Inconsistent And Petitioner Fails To Show The Proposed District Court Constructions Are Met	
	B.	37 C.F.R. § 42.100(b) Was Intended To Preclude A Petitioner From Taking Inconsistent Claim Constructions	
III.		TITIONER FAILS TO SHOW OBVIOUSNESS OVER ITS MBINATIONS (ALL CLAIMS, ALL GROUNDS)	
	А.	Petitioner Fails To Prove Its Combinations Disclose Or Render Obvious "Multiplexed" "Signals" (Claims 1, 27; Grounds 1B, 1D)	
		1. Petitioner Misstates Yegoshin's Teachings And Fails To Substantiate The Alleged Motivation To Combine	
		<ol> <li>Petitioner Fails To Show That Bernard Teaches "Multiplexed" "Signals" Under Either Its Own Or Patent Owner's Proposed District Court Claim Constructions</li></ol>	
		<ol> <li>Petitioner Fails To Prove That The POSITA Would Be Motivated To Combine Yegoshin And Bernard As Proposed</li></ol>	
	B.	The Petition Fails To Prove That Its Combinations Disclose Or Render Obvious "Combin[ing] The Data Paths Into A Single Transmission Interface To One Or More Applications" (Claim 17; Grounds 1C)	

C.	<ul> <li>Petitioner Fails To Prove Its Combinations Disclose Or Render</li> <li>Obvious "The First Wireless Component Is Accessible On A First</li> <li>IP Address And The Second Wireless Transmit And Receive</li> <li>Component Is Accessible On A Second IP Address" Or "A</li> <li>Plurality Of IP Enabled Interfaces" (Claims 1, 14; Grounds 1A, 1B, 1C).</li> </ul>	
	1. Petitioner Fails To Explain How The POSITA Would Associate A Second IP Address With Yegoshin's Phone46	
	2. The Combination As Proposed Would Not Meet The Claims Because Only Yegoshin's Second (IP/LAN) Communication Interface Would Be Accessible On The IP Addresses	
D.	The Petition Fails To Present A Rationale For The POSITA To Combine All The References Together To Meet The Claims	
<b>CO</b> ]	NCLUSION63	

IV.

Case IPR2022-01248 Patent 8,842,653

# **TABLE OF AUTHORITIES**

## Page(s)

### **COURT DECISIONS**

In re Anova Hearing Labs, Inc., 809 Fed. App'x. 840 (Fed Cir. 2020)55
ATD Corp. v. Lydall, Inc., 159 F.3d 534 (Fed. Cir. 1998)42
<i>Cheese Sys. v. Tetra Pak Cheese &amp; Powder Sys.</i> , 725 F.3d 1341 (Fed. Cir. 2013)
<i>In re DataTreasury Corp.</i> , 669 F. App'x 574 (Fed. Cir. 2016)
<i>Ecolochem, Inc. v. S. Cal. Edison Co.</i> , 227 F.3d 1361 (Fed. Cir. 2000)42
<i>Fid. Fed. Sav. &amp; Loan Ass'n v. de la Cuesta</i> , 458 U.S. 141 (1982)14
<i>Gen. Elec. Co. v. Raytheon Techs. Corp.</i> , 983 F.3d 1334 (Fed. Cir. 2020)
<i>Halo v. Yale Health Plan</i> , 819 F.3d 42 (2nd Cir. 2016)14
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006)23
<i>Kim v. ConAgra Foods, Inc.</i> , 465 F.3d 1312 (Fed. Cir. 2006)
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007)23

<i>In re Magnum Oil Tools Int'l, Ltd.</i> , 829 F.3d 1364 (Fed. Cir. 2016)	23
In re Medicis Pharm. Corp., 356 F. App'x 411 (Fed. Cir. 2009)	59
Monarch Knitting Mach. Corp. v. Sulzer Morat Gmbh, 139 F.3d 877 (Fed. Cir. 1998)	42
Prime Datum, Inc. v. Baldor Elec. Co., 670 Fed. App'x. 702 (Fed. Cir. 2016)	57
<i>Ruiz v. A.B. Chance Co.</i> , 357 F.3d 1270 (Fed. Cir. 2004)	42, 63
<i>In re Schweickert</i> , 676 F. App'x 988 (Fed. Cir. 2017)	60

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Baldor Elec. Co. v. Prime Datum, Inc., Appeal 2014-001464, Inter Partes Reexam. 95/002,286, Decision On Appeal (PTAB June 29, 2015)
Belvac Prod. Mach., Inc. v. Crown Packaging Tech., IPR2019-01076, Paper 9 (Oct. 29, 2019)23
Carefusion Corp. v. Baxter Int'l, Inc., IPR2016-01456, Paper 9 (Feb. 6, 2017)11
<i>Ex Parte Evans</i> , 2017 Pat. App. LEXIS 7272 (PTAB Aug. 1, 2017)60
Ford Motor Co. v. Mass. Inst. Tech., IPR2020-00010, Paper 9 (Mar. 26, 2020)16
Google Inc. v. Koninklijke Philips N.V., IPR2017-00409, Paper 10 (June 5, 2017)24

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