Filed: May 26, 2023

#### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

SMART MOBILE TECHNOLOGIES LLC, Patent Owner.

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Case IPR2022-01249 Patent 9,019,946

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PATENT OWNER'S RESPONSE



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	В.	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	
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