UNITED STATES PATENT AND TRADEMARK OFFICE

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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,
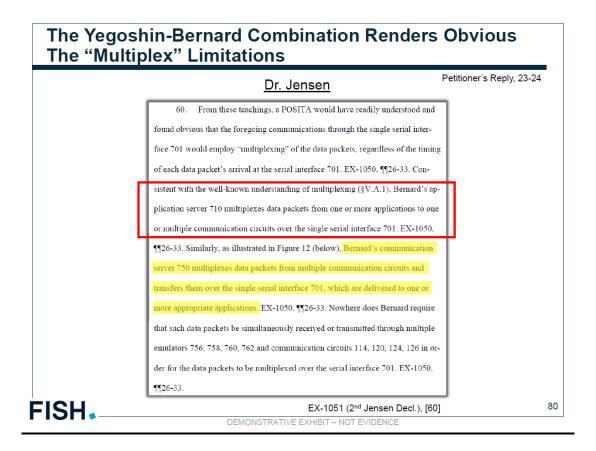Patent Owner

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Case IPR2022-01249
Patent 9,019,946 B1

_____

**PATENT OWNER'S OBJECTIONS TO PETITIONER'S
DEMONSTRATIVE EXHBITS**

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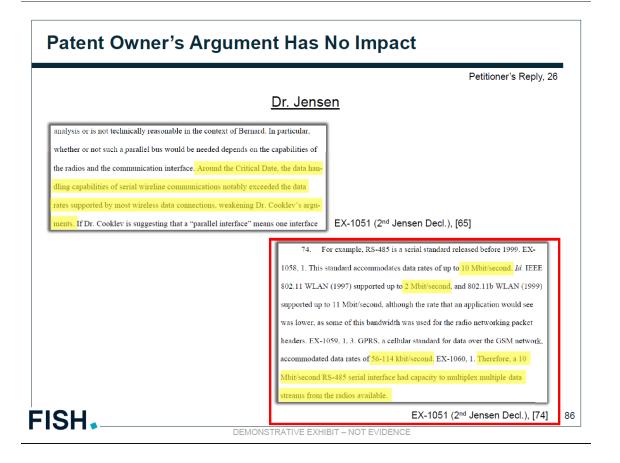
exhibits.

Slide 80:

The statement boxed in red is a portion of Petitioner's expert declaration

(Exhibit 1051, [60]) which was improperly incorporated by reference into

Petitioner's Reply (at 23), 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 32-39) and the Reply (at 22-25) which expressly mapped

that functionality to the "communication server 750" on Bernard's cradle.

Slides 86 and 95:

The statement boxed in red is Petitioner's expert declaration (Exhibit 1051, [74]) providing approximately 100 words of numerical analysis based on Exhibit 1059, 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.

Patent Owner's Argument Has No Impact

Petitioner's Reply, 26

<u>Dr. Jensen</u>

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.), [65]

74. 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.), [74]   86

FISH.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

Sufficient Motivation Exists For Combining Yegoshin and Bernard

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.), [73]

74. 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.), [74]

FISH.

DEMONSTRATIVE EXHIBIT – NOT EVIDENCE

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Dated: October 24, 2023

Respectfully Submitted,

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