EXHIBIT 9

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.,

Petitioners,

v.

SLYDE ANALYTICS, LLC,

Patent Owner.

Patent No. 10,198,085
Filing Date: October 31, 2017
Issue Date: February 5, 2019

Inventors: Alex Bezinge, Adrian Mohni, Daniel Pfeifer, and Musa Dogan
Title: METHOD AND CIRCUIT FOR SWITCHING A WRISTWATCH
FROM A FIRST POWER MODE TO A SECOND POWER MODE

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PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2024-00041

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4.   The Petition Does Not Show that the Combination of Yeung and Ruiz Discloses "in response to a detection that the orientation of the wristwatch is in the second range, detecting that the wristwatch remains substantially immobile during a predetermined duration and that a duration between the starting position and the final position is in a predefined range," as Required by Claim Element 1[c.3]

Claim 1 of the '085 Patent recites "in response to a detection that the orientation of the wristwatch is in the second range, detecting that the wristwatch remains substantially immobile during a predetermined duration and that a duration between the starting position and the final position is in a predefined range."

Since the combination of Yeung and Ruiz does not disclose the claimed "detecting that an orientation of the wristwatch is then in a final position, wherein said step of detecting that the orientation is in the final position comprises detecting that the orientation is in *a second range different from said first range*," it cannot now disclose the claimed "*in response to a detection that the orientation of the wristwatch is in the second range*, detecting that the wristwatch remains substantially immobile during a predetermined duration and that a duration between the starting position and the final position is in a predefined range." *See supra* Section VI.A.3.

Petitioner also does not show that the combination of Yeung and Ruiz discloses the claimed "duration between the starting position and the final position is in a predefined range." Instead, Petitioner only argues that "[t]he period of time

from when the user begins the double flip to when the user completes the double flip

is within a predefined range of 200ms." Pet. at 37. However, Petitioner incorrectly

conflates the separately claimed "duration" of time with the claimed "predefined

range." As with the previously claimed "first range" and "second range,"

"predefined range" refers to the spatial range or range of positions of the wristwatch.

As noted in the '085 Patent, the claimed "predefined range" or "given range" can be

the angular range in relation to the user's face between the starting position of the

wristwatch and the final position of the wristwatch:

> The accelerometer 23 is set so as to generate an interrupt **when its position changes and reaches a given range** that is maintained during a predetermined duration, as will be described.

'085 Patent, 9:48-51 (emphasis added).

> **The duration between the starting position and the final position may be measured**. If this duration is not in a predefined range, the method is interrupted. Otherwise, the touch controller 24 changes to a No-movement & Angle Check mode. Alternatively, this No-movement & Angle Check detection may be performed by the embedded processing capabilities within the accelerometer 23.

Id., 10:18-24 (emphasis added). Yeung and Ruiz are silent on a predefined spatial

range in which the duration of the movement of the wristwatch occurs.

Therefore, the Petition is deficient because it fails to show that claim element

1[c.3] is disclosed or rendered obvious by the combination of Yeung and Ruiz.

IPR2023-00041
PATENT NO. 10,198,085

Respectfully submitted,

Dated: February 21, 2024   By: / *Peter Lambrianakos*   /
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