

Filed on behalf of: LG Electronics, Inc. and  
LG Electronics U.S.A., Inc.

Paper \_\_\_\_\_

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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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LG ELECTRONICS, INC., and  
LG ELECTRONICS U.S.A., INC.,  
Petitioner

v.

TOSHIBA SAMSUNG STORAGE TECHNOLOGY KOREA CORPORATION,  
Patent Owner

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Case IPR2015-01644  
Patent 6,785,065 B1

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**PETITIONER REPLY TO PATENT OWNER RESPONSE**

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    a. Under the proper construction, the coils of Akanuma are “on each of opposite side surfaces of the bobbin.” .....10

    b. Even under TSST-K’s erroneous construction, the coils of Akanuma are over and in contact with opposite side surfaces of the bobbin. ....11

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**EXHIBIT LIST**

<b>Ex.</b>	<b>Reference</b>
1001	U.S. Patent No. 6,785,065 to Song <i>et al.</i> (filed on Feb. 6, 2004) (issued on Aug. 31, 2004) ("the '065 patent")
1002	U.S. Patent No. 6,343,053 to Akanuma <i>et al.</i> (filed Aug. 25, 1999) (issued Jan. 29, 2002) ("Akanuma")
1003	U.S. Patent No. 5,043,964 to Suzuki (filed May 8, 1990) (issued August 27, 1991) ("Suzuki")
1004	U.S. Patent No. 6,043,935 to Kim <i>et al.</i> (filed December 31, 1998) (issued March 7, 2000) ("Kim")
1005	U.S. Patent No. 5,428,481 to Ikegame <i>et al.</i> (filed November 1, 1990) (issued June 27, 1995) ("Ikegame")
1006	U.S. Patent No. 6,134,058 to Mohri <i>et al.</i> (filed June 29, 1999) (issued October 17, 2000) ("Mohri")
1007	U.S. Patent No. 5,905,255 to Wakabayashi <i>et al.</i> (filed January 14, 1998) (issued May 18, 1999) ("Wakabayashi")
1008	U.S. Patent No. 5,265,079 to Getreuer <i>et al.</i> (filed February 15, 1991) (issued November 23, 1993) ("Getreuer")
1009	U.S. Patent No. 5,719,834 to Futagawa <i>et al.</i> (filed June 27, 1996) (issued February 17, 1998) ("Futagawa")
1010	U.S. Patent No. 6,272,079 to Kanto <i>et al.</i> (filed December 1, 1998) (issued August 7, 2001) ("Kanto")
1011	Declaration of Masud Mansuripur, Ph.D.
1012	Deposition Transcript of David B. Bogy

## INTRODUCTION

The arguments made by Toshiba Samsung Storage Technology Korea Corporation (“TSST-K” or “Patent Owner”) in its Patent Owner’s Response (POR) are based entirely upon an overly narrow construction of the term “on.” TSST-K argues -- improperly applying *Philips* rather than BRI -- that “**on** each of opposite side surfaces” recited in independent claim 1 should be construed to require the coils each to be “over and in contact with” the opposite side surfaces. POR (Paper No. 21) at pp. 1-10. To support its construction, TSST-K primarily cites to a hand-selected dictionary definition for “on” when the use of a dictionary is clearly unnecessary. A simple read of the ’065 patent (Ex. 1001) reveals that “on” is used the same as “at” and that the focus is proximity ,not contact. Petitioner’s construction of “on” as not requiring contact is fully supported by the specification, which teaches that the coils are positioned at two opposite sides to open up space at the other sides of the bobbin for the supporting wires. Ex. 1001 at 2:57-3:17, 8:21-30. Indeed, the Board already agreed with Petitioner and rejected a similar argument made by TSST-K in its Preliminary Response. Institution Decision (Paper No. 8) at pp. 13-15. TSST-K offers no new evidence or arguments meriting reversal of the Board’s construction. Because all of TSST-K’s arguments rely on its faulty construction of the word “on,” they should likewise be rejected.

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