Entered: April 28, 2021

UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD SATCO PRODUCTS, INC., Petitioner, v. SEOUL VIOSYS CO., LTD., Patent Owner. Case IPR2020-00704 Patent No. 8,860,331

PATENT OWNER'S SUR-REPLY

TABLE OF CONTENTS

1.	Intro	ntroduction			
II.	Clair	Claim Construction – LED Chip			
III.	Claims 1-7, 10, And 11 Are Patentable Over Petitioner's Proposed Combination Of Martin With Uang And/Or Masatoshi And Setlur				
	A.	Petitioner Fails To Support Its Contention That A POSITA Would Have Modified Martin Based On Uang And/Or Masatoshi			
		1.	Petitioner's new expert fails to show that a POSITA would have modified Martin to achieve the claimed invention	9	
		2.	Petitioner's excuses for providing no evidence to show how a POSITA would implement its proposed modification fail	14	
		3.	Petitioner's attorney argument fails to justify why a POSITA would have replaced Martin's bridge rectifier with a bridge rectifier composed entirely of GaN-based LEDs	17	
		4.	Petitioner's contorted reliance on arguments <i>for</i> patentability fails to justify its proposed combination	23	
	B.	A POSITA Would Not Have Found It Obvious To Further Modify Martin Based On Setlur		24	
	C.	Martin Does Not Disclose Or Suggest The Claimed LED Chip Comprising An Array / A Plurality Of Light Emitting Cells		26	
	D.	Petitioner Failed To Meet Its Burden To Show That Setlur Discloses Claim 5's Decay Time Limitation			
IV.	Clair	Claim 11 Is Patentable Over Nagai2			



	A.	Petitioner's Argument That Nagai Discloses The Claimed LED Chip Rests On Its Erroneous Construction	27
	В.	The Board Should Reject Petitioner's Argument About Obviousness Of The Decay Time Limitation	28
V	Con	clusion	28



TABLE OF AUTHORITIES

Page(s) **CASES** Belden Inc. v. Berk-Tek LLC, Graham v. John Deere Co., In re Magnum Oil Tools, Int'l, Ltd., Millennium Pharm., Inc. v. Sandoz Inc., 862 F.3d 1356 (Fed. Cir. 2017)23 N. Am. Vaccine, Inc. v. Am. Cyanamid Co., 7 F.3d 1571 (Fed. Cir. 1993)6 PPC Broadband, Inc. v. Corning Optical Commc'ns RF, LLC, Samsung Elecs. Co., Ltd. v. Elm 3DS Innovations, LLC, SIMO Holdings Inc. v. Hong Kong uCloudlink Network Tech. Ltd., Spectra-Physics, Inc. v. Coherent, Inc., Trivascular, Inc. v. Samuels, Trs. of Columbia Univ. in the City of New York v. Illumina, Inc., 620 F. App'x 916 (Fed. Cir. 2015)......17



STATUTES

35 U.S.C.	
§ 103	
§ 112	17
§ 316(e)	
REGULAT	IONS
37 C.F.R. § 42.104(b)(3)	2



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

