

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
LG ELECTRONICS INC., and
LG ELECTRONICS U.S.A., INC.,
Petitioners,

v.

PARUS HOLDINGS INC.,
Patent Owner.

Case No. IPR2020-00846
Patent No. 7,076,431

**PETITIONERS' REPLY
TO PATENT OWNER'S PRELIMINARY RESPONSE**

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STATUTES

35 U.S.C. § 315(b)4

35 U.S.C. § 316(b)7

LISTING OF EXHIBITS

Exhibit	Description
1001	U.S. Patent 7,076,431 (“431 patent”)
1002	Declaration of Stuart J. Lipoff (“Lipoff”)
1003	Curriculum Vitae of Stuart J. Lipoff
1004	U.S. Patent Publication 2001/0047262 (“Kurganov-262”)
1005	PCT Publication WO2001/050453 (“Kovatch”)
1006	U.S. Provisional Application 60/174,371 (“Kovatch-Provisional”)
1007	U.S. Patent 6,324,534 (“Neal”)
1008	U.S. Patent 6,418,433 (“Chakrabarti”)
1009	U.S. Patent 5,787,470 (“DeSimone”)
1010	U.S. Patent 5,855,020
1011	U.S. Patent 6,085,160
1012	U.S. Patent 6,434,524
1013	McGraw-Hill Electronics Dictionary (6th ed. 1997) (“McGraw-Hill”)
1014	American Heritage Dictionary of the English Language (3d ed. 1996)
1015	Dictionary of Computing (4th ed. 2002)
1016	Scheduling Order (Dkt. 85), <i>Parus v. Apple Inc.</i> , 6:19-cv-00432-ADA (consolidated cases) (W.D. Tex. Jan. 17, 2020)
1017	Parus Holding’s Inc.’s First Amended Complaint for Patent Infringement, <i>Parus Holdings Inc. v. Apple Inc.</i> , 6:19-cv-00432-ADA (W.D. Tex. Oct. 21, 2019)
1018	Parus Holding’s Inc.’s First Amended Complaint for Patent Infringement, <i>Parus Holdings Inc. v. Google LLC</i> , 6:19-cv-00433-ADA (W.D. Tex. Oct. 21, 2019)
1019	Parus Holding’s Inc.’s First Amended Complaint for Patent Infringement, <i>Parus Holdings Inc. v. LG Electronics, Inc. et al.</i> , 6:19-cv-00437-ADA (W.D. Tex. Dec. 5, 2019)
1020	Parus Holding’s Inc.’s First Amended Complaint for Patent Infringement, <i>Parus Holdings Inc. v. Samsung Electronics Co., Ltd. et al.</i> , 6:19-cv-00438-ADA (W.D. Tex. Nov. 19, 2019)
1021	U.S. Patent 9,451,084 (“084 patent”)
1022	U.S. Provisional Application 60/180,344
1023	U.S. Provisional Application 60/233,068
1024	Prosecution History of U.S. Patent Application 09/776,996 (U.S. Patent 6,721,705)
1025	Prosecution History of U.S. Patent Application 10/821,690

Exhibit	Description
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1026	Prosecution History of U.S. Patent Application 11/409,703 (U.S. Patent 7,386,455)
1027	Prosecution History of U.S. Patent Application 12/030,556 (U.S. Patent 7,881,941)
1028	Prosecution History of U.S. Patent Application 12/973,475 (U.S. Patent 8,185,402)
1029	Prosecution History of U.S. Patent Application 13/462,819 (U.S. Patent 9,451,084)
1030	Prosecution History of U.S. Patent Application 15/269,776 (U.S. Patent 10,096,320)
1031	Prosecution History of U.S. Patent Application 16/155,523 (pending)
1032	Order Granting Defendant LG's Motion to Transfer Venue Under 28 U.S.C. § 1404, <i>Parus Holdings Inc. v. LG Elecs. Inc. & LG Elecs. U.S.A., Inc.</i> , 6:19-CV-00437-ADA (Aug. 6, 2020)
1033	Lauren A. Watt & Graham C. Phero, <i>Success of Motions to Stay Rising, But Why?</i> , https://www.sterneckessler.com/news-insights/publications/success-motions-stay-rising-why (Feb. 2020) (last checked Aug. 25, 2020)
1034	Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (Mar. 13, 2020)
1035	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (Apr. 15, 2020)
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1038	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (July 2, 2020)
1039	Supplemental Order Regarding Court Operation Under the Exigent Circumstances Created by the COVID-19 Pandemic (C.J. Garcia) (Aug. 6, 2020)
1040	PACER Docket Activity Report (Criminal Matters) for the United

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