

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: IPR2020-00846
U.S. Patent No. 7,076,431 B2

PATENT OWNER PARUS HOLDINGS, INC.'S NOTICE OF APPEAL

via E2E
Patent Trial and Appeal Board

via Priority Mail Express
Director of the United States Patent and Trademark Office
c/o Office of the General Counsel, 10B20
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

via CM/ECF
United States Court of Appeals for the Federal Circuit

Pursuant to 35 U.S.C. §§ 141-142 and 319, 37 C.F.R. §§ 90.2-90.3, Federal Rule of Appellate Procedure 15, and Federal Circuit Rule 15, Patent Owner Parus Holdings, Inc. (“Patent Owner”) hereby provides notice that it appeals to the United States Court of Appeals for the Federal Circuit from the Final Written Decision of the Patent Trial and Appeal Board (the “Board”) entered on October 19, 2021 (Paper No. 31) (the “Final Written Decision”), and from all underlying findings, determinations, rulings, opinions, orders, issues, and decisions regarding the *inter partes* review of United States Patent No. 7,076,431 (the “’431 Patent”). This Notice of Appeal and petition for review of the Final Written Decision is timely under 37 C.F.R. § 90.3(a)(1), having been filed within 63 days of the Final Written Decision.

In accordance with 37 C.F.R. § 90.2(a)(3)(ii), Patent Owner states that the issues and determinations to be challenged on appeal include, but are not limited to: (i) the Board’s determination that Patent Owner’s earlier conception and reduction to practice arguments were not in compliance with Rule 42.6(a)(3) and thus were improperly incorporated by reference; (ii) the Board’s further determination that it would not consider Patent Owner’s earlier conception and reduction to practice arguments and evidence in this proceeding; (iii) the Board’s determination that claims 1, 2, 4-7, 9, 10, 13, and 14 of the ’431 Patent were shown to be obvious under 35 U.S.C. § 103(a) and thus are unpatentable; (iv) the Board’s interpretation of the prior art; (v) the Board’s legal errors in undertaking its obviousness analysis; (vi) the

Board's findings that conflict with the evidence of record or are otherwise unsupported by substantial evidence; (vii) the Board's failure to consider evidence of record fully and properly; and (viii) any other findings or determinations supporting or relating to these issues as well as all other issues decided adversely to Patent Owner in any orders, decisions, rulings, or opinions in this proceeding.

Simultaneously with this submission, Patent Owner is filing a true and correct copy of this Notice of Appeal with the Director of the United States Patent and Trademark Office as well as a true and correct copy of the same, along with the required filing fee, with the Clerk of the United States Court of Appeals for the Federal Circuit as set forth in the accompanying Certificate of Filing.

Dated: December 15, 2021

Respectfully submitted,

/s/ John B. Campbell

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Counsel for Patent Owner

Parus Holdings, Inc.

CERTIFICATE OF FILING

The undersigned hereby certifies that, in addition to being electronically filed through E2E, a true and correct copy of the above-captioned PATENT OWNER PARUS HOLDINGS, INC.'S NOTICE OF APPEAL is being filed via Priority Mail Express with the Director on December 15, 2021, at the following address:

Director of the United States Patent and Trademark Office
c/o Office of the General Counsel, 10B20
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450

The undersigned also hereby certifies that a true and correct copy of the above-captioned PATENT OWNER PARUS HOLDINGS, INC.'S NOTICE OF APPEAL and the filing fee is being filed via CM/ECF with the Clerk's Office of the United States Court of Appeals for the Federal Circuit on December 15, 2021.

Dated: December 15, 2021

Respectfully submitted,

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*Counsel for Patent Owner
Parus Holdings, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing PATENT OWNER PARUS HOLDINGS, INC.'S NOTICE OF APPEAL was served via electronic mail on December 15, 2021, in its entirety on the following:

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