

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., and
TAIWAN SEMICONDUCTOR MANUFACTURING CO. LTD.,
Petitioner,

v.

ARBOR GLOBAL STRATEGIES, LLC,
Patent Owner.

Case IPR2020-01021¹
U.S. Patent No. 7,282,951

PATENT OWNER'S NOTICE OF APPEAL

¹Taiwan Semiconductor Manufacturing Co. Ltd. filed a petition in IPR2021-00394 and has been joined as a party to this proceeding.

Pursuant to 35 U.S.C. §§ 141 and 142 and 37 C.F.R. §§ 90.2 and 90.3, Arbor Global Strategies, LLC (“Arbor” or “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 November 24, 2021, (Paper 30)² and from all underlying orders, decisions, rulings, and opinions regarding U.S. Patent No. 7,282,951 (“the ’951 Patent”) at issue in *inter partes* review IPR2020-01021.

The issues on appeal, pursuant to 37 C.F.R. § 90.2(a)(3)(ii) include, but are not limited to, the Board’s interpretation and construction of the claims, including the Board’s construction of the terms in the final written decision; the Board’s determination that Petitioner showed by a preponderance of the evidence that claims 1, 4, 5, 8, 10, and 13–15 of the ’951 Patent are unpatentable; motivation to combine the asserted references; the Board’s reliance on arguments that exceeded the proper scope of Petitioner’s Reply; any finding or determination supporting or

² Arbor filed a Request for Director Review on December 24, 2021, and on February 4, 2022 the Director denied the Request and the Board filed an errata to the Final Written Decision. Paper 33. Thus, Arbor’s Notice of Appeal is timely. *See* 35 U.S.C. § 142; 37 C.F.R. §§ 90.3(a)(1), (b)(1).

related to those issues; all other issues decided adversely to Patent Owner in any orders, decisions, rulings, and opinions.

Copies of Patent Owner's Notice of Appeal are being filed simultaneously with the Director of the United States Patent and Trademark Office, the Patent Trial and Appeal Board, and the United States Court of Appeals for the Federal Circuit.

Respectfully submitted,

Dated: February 10, 2022

/James Hannah/

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Attorneys for Patent Owner

CERTIFICATE OF SERVICE

The undersigned certifies, in accordance with 37 C.F.R. § 42.6(e), that service was made on the Petitioner as detailed below.

Date of service February 10, 2022

Manner of service Electronic Mail
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Documents served PATENT OWNER'S NOTICE OF APPEAL

Persons Served F. Christopher Mizzo
Gregory S. Arovas
Bao Nguyen
James Glass
Ziyong Li

In addition, the foregoing Patent Owner's Notice of Appeal was filed by Express Mail on February 10, 2022, with the United States Patent and Trademark Office at the following address:

Office of the Solicitor
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Patent Owner's Notice of Appeal
IPR2020-01021 (U.S. Patent No. 7,282,951)

The undersigned hereby certifies that the foregoing Patent Owner's Notice of Appeal was electronically filed with the United States Court of Appeals for the Federal Circuit through CM/ECF and pay.gov on February 10, 2022.

/James Hannah /
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Registration No. 56,369
Counsel for Patent Owner