

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD.,
Petitioner,

v.

MOJO MOBILITY INC.,
Patent Owner.

Case IPR2023-01089
Patent 11,292,349

PETITIONER'S REPLY

Samsung Electronics Co., Ltd. (“Petitioner”) submits this Reply in response to Patent Owner’s Response (Paper 13) (“Response”). In the Response, Patent Owner does not offer a rebuttal to Petitioner’s evidence submitted with the Petition and the Board’s reasons for instituting *inter partes* review. Instead, Patent Owner submits that “[t]he ’349 Patent is no longer being asserted against Samsung in the co-pending District Court proceedings, and, as a result, Mojo elects to not proffer additional argument on the papers or through any hearings that may occur in this proceeding.” (Response, 1.)

Given the absence of a substantive response from Patent Owner, the Board should find unpatentable and cancel the challenged claims for at least the reasons set forth in the Petition and accompanying exhibits, and the Board’s decision to institute *inter partes* review.

Respectfully submitted,

Dated: June 27, 2024

By: /Naveen Modi/
Naveen Modi (Reg. No. 46,224)
Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, I caused a true and correct copy of the foregoing Petitioner's Reply to Patent Owner's Response to be served electronically on counsel for Patent Owner at the following addresses:

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