

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner

v.

DH INTERNATIONAL LTD.,
Patent Owner

PTAB Case No. IPR2024-01322

Patent No. 9,022,294

**PATENT OWNER'S REQUEST FOR DIRECTOR REVIEW UNDER
37 C.F.R. § 42.75 OF A DECISION TO INSTITUTE**

April 7, 2025

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1001	U.S. Patent No. 9,022,294
1002	Prosecution History of U.S. Application 12/603,085
1003	Declaration of Stuart J. Lipoff
1004	CV of Stuart J. Lipoff
1005	U.S. Patent No. 6,941,156 (Mooney)
1006	U.S. Patent No. 6,909,705 (Lee)
1007	U.S. Patent No. 6,697,638 (Larsson)
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1010	U.S. Patent No. 6,931,266 (Miyoshi)
1011	U.S. Patent No. 6,526,287 (Lee)
1012	U.S. Patent No. 6,845,097 (Haller)
1013	ORDER Dismissing DHI v. Google, 1-23-cv-1116
2001	Declaration of Safwan Zaheer
2002	Prosecution History of U.S. Patent No. 7,628,333
2003	CTP_SPEC_V11
3001	Email String Regarding Sur-Replies

Pursuant to 37 CFR § 42.75, Patent Owner DH International Ltd. (“PO”) submits this Request for Director Review of the Board’s Decision Instituting (“DI”) *inter partes* review of claims 1-20 of U.S. Patent No. 9,022,294 (the “’294 Patent”). The Board abused its discretion by (1) failing to apply the proper legal standard to the analysis of the claim elements and (2) allowing Petitioner to submit a pre-institution reply on claim construction when (a) Petitioner’s request did not meet “a showing of good cause” or of unusual or unforeseen claim constructions contained in the POPR, and (b) language of the request was not provided to PO before submission to the Board (Exh. 3001).

I. LEGAL STANDARD FOR DIRECTOR REVIEW

“Requests for Director Review of the Board’s decision whether to institute an AIA trial ... shall be limited to decisions presenting (a) an abuse of discretion or (b) important issues of law or policy.” *See USPTO, Revised Interim Director Review Process* at 2.B, Availability of Director Review: AIA Trial Proceedings (last modified Feb. 5, 2025). An abuse of discretion is found if a decision (1) is clearly unreasonable, arbitrary, or fanciful; (2) is based on an erroneous conclusion of law; (3) rests on clearly erroneous fact finding; or (4) involves a record that contains no evidence on which the Board could rationally base its decision. *Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd.*, 821 F.3d 1359, 1367 (Fed. Cir. 2016).

The standard to institute an *inter partes* review is the “likelihood that the petitioner would prevail.” “The Director may not authorize an *inter partes* review to be instituted unless the Director determines that the information presented in the petition filed under section 311 and any response filed under section 313 shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). Petitioner has the burden of proving unpatentability by a preponderance of the evidence in an IPR. 35 U.S.C. § 316(e) (The statute requires a preponderance of the evidence for instituted IPRs, but it is unsettled whether a different standard exist prior to institution). The Board has discretion to either grant or deny the request for a pre-institution reply, based on “a showing of good cause” under 37 C.F.R. § 42.108(c).

II. IMPORTANT ISSUE OF LAW

PO’s Request presents an important and unsettled issue of law that only the Director can resolve. The evidentiary standard to be applied by the Board prior to institution is neither settled nor consistently applied. The statute at 35 U.S.C. § 316(e) provides a “preponderance of evidence” standard *once an IPR has been instituted*, and institution is based on a “likelihood of success” standard. However, no standard has been articulated for the Board to use in determining if elements are found in the references. This issue cannot be resolved by the Courts, as only Instituted IPRs can be appealed. *See* 35 U.S.C. § 316(e). Leaving its resolution solely with the Director.

The only statement in the DI of what standard the Board used when weighing facts related to the elements of the claims is “upon consideration.” *See* DI, p. 2. However, “upon consideration” cannot be a proper standard because it is entirely subjective. “Upon consideration” could be higher than a “likelihood of success” standard, or more likely lower, such as “upon *any* consideration” IPR is instituted. While this Request is not the place to collect and chart the standards applied in institution decisions, at least the following different standards or no standard have been applied: IPR2024-01321. (upon consideration), IPR2024-01205 (considered the arguments), IPR2023-00918 (no standard), and IPR2022-01150 (no standard).

Both patent owners and petitioners deserve to know the Board’s standard applied prior to institution when evaluating evidence. Here, PO respectfully requests the Director set forth the correct standard. In doing so, PO submits that whatever standard is applied, institution should be denied here because *Mooney* fails to teach or disclose an “activation cue” as required by element [1.e] and present in all challenged claims.

III. ARGUMENT

A. “Upon Consideration” is a Subjective Standard that Cannot be Properly Used to Institute IPR

The Board articulated that it used an “upon consideration” standard when weighing the evidence provided in the Petition, POPR, Pre-Reply, and Sur-Reply. *See* DI, 2. The Board never articulated whether its institution was based on “likelihood of success,” and here, it cannot be because element [1.e] is entirely missing from the prior

art. An “upon consideration” standard is not defined, is subjective, and is different from “likelihood of success” set forth in the statute. *See* 35 U.S.C. § 316(e). Under the proper “likelihood of success” standard, institution should be denied.

B. Under a “Likelihood of Success” Standard, IPR Should be Denied Because Petitioner’s Prior Art Fails to Show Limitation [1.e]

All ’294 Patent claims require the cellular phone to receive “an activation cue.” *See, e.g.*, Exh. 1001, 19:20-22 [1.e]. Petitioner argued the prior art to *Mooney* discloses “an activation cue.” However, Petitioner failed to show where *Mooney* discloses the cellular phone receiving the claimed “activation cue.” Instead, Petitioner relied on *Mooney*’s distinct Bluetooth signal sent from the mobile handset *after* a connection has been established as satisfying the activation cue. Pet. p. 26. Thus, the absence of element [1.e] requires DI reversal in its entirety for this IPR.

1. Element [1.e] “activation cue” is not taught by *Mooney*

The claims of the ’294 operate differently than *Mooney*:

’294 Patent	<i>Mooney + Bluetooth Spec.</i>
Cellular phone is able to have communication with a data exchange device. Exh. 1001, 13:33-35.	Cordless phone transmits pages to cordless base unit for detecting signal. Exh. 2003, 111.
Activation cue sent by the data exchange device ... is “received” by the cellular phone. Exh. 1001, 9:22-27; Element [1.e] claim 1.	Data is exchanged to set up link. Exh. 2003, 111.
Data is exchanged or conveyed in response to the activation cue. <i>See</i> claims.	Call transferred by cordless phone to active link after expiration of a two-minute timer. Exh. 1005, 6:14-29. [Petitioner’s purported “activation cue”]

In the '294 Patent, “an activation cue” is described as:

[A]n activation cue can be received by electronic device 10 from data exchange device transceiver 9a. This activation cue is in the form of a data communication of a specific type which will be recognized by electronic device 10 as an activation cue, for example a predetermined bit sequence.

Exh. 1001, 9:22-27 (*emphasis added*). The activation cue must be a specific type of data communication from an external source, which will be recognized by the electronic device of the claims *before* data is transmitted. Exh. 2002, pp. 218-219.

Petitioner relies on the teachings of Bluetooth contained in *Mooney* as disclosing “an activation cue.” *Mooney* makes use of “‘piconet technology’¹ in general, and Bluetooth technology in particular.” Exh. 1005, 2:39-40. *Mooney* incorporated by reference a Bluetooth standard. *Id.* 2:57-64. However, neither Petitioner nor its Expert considered, much less entered into evidence, the incorporated Bluetooth specification, version 1.1. This oversight is important because the Bluetooth specification explicitly contradicts Petitioner and its expert. Therefore, PO entered it as evidence at Exh. 2003.

Petitioner’s expert relies on is his own opinion of what a POSITA would

¹ “Piconet technology” is described in the Bluetooth specification as Bluetooth signalling used for cordless phones.

know, but the incorporated Bluetooth specification is what a POSITA *actually* knew at the time *Mooney* was filed. *See* Exh. 2003, published Feb. 22, 2001. Additionally, Petitioner’s expert is not a Bluetooth expert. *See* Exh. 1003, ¶¶9-22. Because Petitioner’s own knowledge and experience contradict the Bluetooth specification, it is *per se* improper.

a. The Petition Relies on Conclusory and Unsupported Statements about *Mooney*

“A petitioner cannot employ mere conclusory statements.” *In re Magnum Oil Tools Int’l, Ltd.*, 829 F.3d 1364, 1380 (Fed. Cir. 2016). In *Mooney*, a Bluetooth link is established between the cellular device and the cordless telephone base station (“CTBS”) in response to a call. However, the Petition erroneously asserts that the claimed cellular phone acts as *Mooney*’s cordless handset. Pet. p. 8. Once the call is established, the *Mooney* cellular device monitors the quality of the Bluetooth signal for a two-minute time period. If the signal quality is maintained, the cellular device switches the call to the cordless base unit. Pet. pp. 26-27. Petitioner provides an example of during an active call in the cellular network, the cellphone comes into range of a Bluetooth CTBS:

When a caller on the multimode cell phone is “within range of the cordless telephone base station [CTBS] that is matched to the cordless telephone mode of the 3-in-1 cell phone” and/or the “cordless telephone link (e.g., a piconet BLUETOOTH™ link of good quality)”

has been established with the cordless base for a given length of time (e.g., for at least two minutes),” the piconet/Bluetooth cordless module is informed of the signal quality (via its first transceiver/ cue receiver) and a call may be established in cordless mode via the BLUETOOTH™ link. Mooney, 2:53-3:7, ... Fig. 2 (illustrating the call of Figure 1 established using the BLUETOOTH™ link in cordless mode); Lipoff, ¶99.

Pet. pp. 26-27 (*emphasis added*) (citing and quoting Exh. 1003, ¶99). Petitioner relied on the teachings of *Mooney’s* Bluetooth piconet to assert that an “activation cue” is the “receiving ‘quality’ Bluetooth signals (an activation cue) from a ‘piconet front end’ and ‘base unit’ (source external to the cellular phone).” Pet. p. 26.²

Without explaining how “quality Bluetooth signals” or “for at least two minutes” equate to “an activation cue,” Petitioner’s determination is nothing short of conclusory. *See* Pet. p. 26. Petitioner never explains where the purported “activation cue” was received or what was its link quality. The Petition’s quote above simply teaches a link (e.g., “connection”) was established for two minutes and provides no explanation of why that link would be considered a received “activation cue.” Although *Mooney’s* “cordless module” is “informed of the signal quality,” the

² Note that the terms “cue receiver” and “activation cue” were added by Petitioner and its expert in the above discussion. *Mooney* does not mention, teach, or suggest that it has any sort of “activation cue.”

claim requires that the “activation que” be received by the cellular telephone.”

b. The POPR Showed that Petitioner’s Arguments Are Contrary to the Bluetooth Standard

Bluetooth, as described in Exh. 2003 and incorporated into *Mooney*, operates contrary to Petitioner’s description. First, *Mooney* does not describe a “Bluetooth signal link of good quality” as a quantified, measured, or monitored attribute of the signal link, such as signal strength. That is Petitioner’s embellishment. Instead, *Mooney* only describes a Bluetooth link established for a duration of two minutes before transferring a cellular call to the cordless base unit. *Mooney* does not teach or suggest the “activation cue” as asserted by Petitioner.

In addressing element [1.e], the POPR described what actually occurs in *Mooney*. First, no Bluetooth link can ever exist without the cellular telephone operating in the cordless telephone mode, (e.g., actively communicating with the cordless telephone base unit).

Further when the cellular telephone comes into range of the cordless telephone base unit. It is the cellular telephone that transmits a Bluetooth ping to notify the cordless telephone base unit it is in range; it is not an ‘activation cue’ received by the cellular telephone when it detects a signal from the cordless telephone base.

POPR, p. 24 (*emphasis added*). Hence, the cellular phone in *Mooney* contacts the cordless phone and not the other way around. Exh. 2003, 111.

Further, *Mooney's* purported measurement of Bluetooth signal quality or two-minute connection time cannot be the claimed “activation cue.” The Bluetooth specification incorporated by *Mooney*, explains the process:

A TL [terminal or cordless telephone] that is out of range of a GW (gateway) [or cordless base unit] searches for it by periodically trying to page it. A GW shall devote as much of its free capacity as possible (considering power limitations and ongoing signalling) to page scanning in order to allow roaming TLs that enter the range of the GW to find it as quickly as possible. ... When a TL has successfully paged a GW, a master-slave switch shall be performed since the GW shall be the master. A connection-oriented L2CAP channel and, possibly, a L2CAP connectionless channel are established to be used for all TCS signaling during that Cordless Telephone session.

Exh. 2003, 111; POPR, p.24. The terminal (e.g., the cordless telephone) that is sending a page does not *receive* the “activation cue.” Similarly, when a cellular phone in *Mooney* is incorporated, it too sends the page or “pings” the CTBS:

The cellular telephone continually transmits pings and attempts to contact the GW (cordless telephone base unit), regardless of the Bluetooth strength. So, the received signal strength is not what the cellular telephone uses to determine if it is in the range of a GW.

It is the GW that determines if it has received the page from the cellular phone, and to receive the page, the GW must have an adequate signal FROM the cellular telephone.

Exh. 2001, ¶72; POPR, p. 24-25. The Bluetooth link between the cellular telephone and the cordless base unit is established only when in active use. The Bluetooth specification states that:

A TL [cordless telephone] that is within range of a GW [cordless base unit] shall normally be in park mode when it is not engaged in calls.

Exh. 2003, 111 (emphasis in original); POPR, p. 25. The terminal (cordless telephone) is in “park mode” when not engaged in a call. “Upon arrival of an incoming call, or when a TL wants to make an outgoing call, the GW shall be put in active mode. The L2CAP channels...are used for all TCS control signaling.” Exh. 2003, 111; POPR, p. 25. Thus, no link exists without a call being set up and established. No quality of signal can be determined for a link until a call is actually established. Once the call is set up or established, then the two-minute timer starts.

The two-minute timer cannot act as “an activation cue” because it is not received by *Mooney’s* cellular phone but is actually set within the cellular phone. *See* Exh. 1005, 6:15-24. The timer is not set before activation of the link and only *after* activation of a call over the Bluetooth link, prior to *Mooney’s* cellular phone transferring the cellular call. “A timer is used within the cellular telephone to time the link (i.e., call). This timer is internal to the cellular telephone and is not received

as required by the claim element of the '294 Patent.” Exh. 2001, ¶76; POPR p. 26. Further, the transfer of the active call is initiated by the cellular phone in *Mooney*, so the transfer cannot be an activation cue. *See* Exh. 1005, 6:25-29.

Mooney fails to teach “activation cue” because 1) call data is transmitted *before* Petitioner’s alleged activation cue is received in the active state assigned, and 2) the timer for the at least two-minute time period is not “external to said cellular phone” because *Mooney*’s cellular phone itself sets the time period and also causes transfer. Exh. 2001, ¶77; POPR p.26-27.

2. The Board’s Decision to Institute Erroneously Found an “Activation Cue” Occurs in Element [1.e] when a Quality Bluetooth Signal (e.g., call received for two minutes) is Received From the Cordless Base Unit

The Board erroneously found “that the piconet/Bluetooth cordless module of the cellular phone in *Mooney* receives a quality Bluetooth signal from the cordless base unit, which acts as an ‘activation cue’ to switch a phone call (transmission of voice/call data) from cell phone mode to Bluetooth mode.” DI, p. 27(emphasis added)(for element [1.e]). However, the '294 Patent requires an “activation cue” that occurs *before* data is exchanged, not two minutes after a link is active and data has been exchanged. *See* POPR, p. 7 (*citing* Exh. 2001, ¶¶31-32). Further, the “activation cue” must be “external to said cellular phone,” but the timer in *Mooney* is inside the cellular phone. Additionally, according to the Bluetooth standard, a link does not exist until a call is made because the call must exchange data specific to

that call setup. Exh. 2003, 111. Conversely, the Board erroneously found a link already active for two minutes satisfies the “activation cue.”

Although extrinsic evidence “may be useful to the court,” it is considered “less significant” than the claim language, specification, and prosecution history making up the intrinsic record. *Phillips v. AWH Corp.*, 415 F.3d 1303, 1317 (Fed. Cir. 2005). The Board’s construction of an “activation cue” as a quality timer for when the cellular phone of *Mooney* switches a call goes outside of the intrinsic record, reading limitations of *Mooney* into the ’294 patent. *See* DI, p. 27. Furthermore, Petitioner and the Board confuse disclosure of a device entering Bluetooth range with actually making a call that establishes a link.

Hence, Petitioner did not meet its burden of establishing element [1.e] was found in the references. “Failure to prove the matter as required ... means that the party with the burden of persuasion loses on that point—thus, if the fact trier of the issue is left uncertain, the party with the burden [the petitioner] loses.” *Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.*, 800 F.3d 1375, 1378-79 (Fed. Cir. 2015). The preponderance of the evidence does not support the determining element [1.e] operates as Petitioner and its expert assert. Hence, there can be no likelihood of success, especially when Petitioner’s explanation explicitly contradicts the teachings of the Bluetooth specification that was incorporated by reference into *Mooney*.

C. The Board Improperly Permitted Petitioner's Pre-Institution Reply by Failing to Require Petitioner to Satisfy its Burden to Show that Patent Owner's Claim Construction was Unforeseen

Petitioner requested a 10-page pre-institution reply stating that “[g]ood cause exists ... Petitioner could not have foreseen PO’s construction of ‘activation cue’ was inconsistent with the ’294 patent’s disclosure.” Exh. 3001, p. 4. Similarly, the terms “data conveyance switching element,” and “close proximity” were asserted as inconsistent with the ’294 Patent’s disclosure. However, Petitioner’s “meet and confer” email to PO only indicated that construction of the term “activation cue” would be requested and did not state the grounds of the request. *See id.*, pp. 2-3. After Petitioner sent its email to the Board requesting construction of three terms, PO notified the Board on January 6, 2025, of Petitioner misleading meet and confer email. Of the additional claim constructions requested, Petitioner only provided in the Petition a conditional claim construction for “data conveyance switching element.” *See* Pet. p. 5-7.

First, Petitioner articulated no “good cause” in its email request to the Board. Petitioner asserted merely that PO’s construction was unforeseeable. However, all of PO’s claim constructions at issue were based upon intrinsic evidence from the ’294 patent; hence, Petitioner had the burden to explain its “good cause.”

Second, prior to granting the pre-institution reply, the Board denied PO an opportunity to argue in a phone conference that there is no unforeseen construction and no basis for granting a pre-institution reply. Thus, Petitioner had the burden to

establish an unforeseen claim construction, which it did not. And, in addition, the Board denied PO's ability to argue this point *prior to* granting the pre-institution reply, thus shifting the burden to the PO to address in the sur-reply.

In granting Petitioner's request, Exh. 3001, p. 1, the Board abused its discretion and allowed Petitioner to create new claim constructions which adversely impacted all the PO's POPR arguments because the claim constructions changed *after* the POPR was filed. Then the Board formed the basis of its institution using Petitioner's newly introduced claim constructions after the POPR was filed prejudicing the PO. *See* DI, pp.12-16.

In *SAS Institute*, the Supreme Court explained that a petition "guide[s] the life of the litigation," and petitioner's contentions "define the scope of the litigation all the way from institution to conclusion." *SAS Inst. Inc. v. Iancu*, 584 U.S. 357, 366, 367 (2018). Here, the Board (1) never made a determination that PO's claim constructions were unforeseen or that Petitioner articulated "good cause" to support a pre-institution reply; (2) never provided PO an opportunity to be heard prior to granting the pre-institution reply; and (3) improperly allowed Petitioner to undermine PO's POPR assertions without the making such findings.

Petitioner in its pre-institution reply (Paper 8) again failed to identify what was unforeseen regarding PO's construction. Indeed, "Petitioner failed to provide any claim construction for 'activation cue' in its Petition. However, it was

foreseeable that PO would construe this claim element claim. Therefore, Petitioner's new claim construction is raising a new argument which the Board admonished the parties not to do." Paper 9, p. 1. Similarly, PO asserted Petitioner's other added claim construction raised new arguments. *See* Paper 9, p.3-4. "Generally, a reply or sur-reply may only respond to arguments raised in the preceding brief. 37 C.F.R. § 42.23 ... 'Respond,' in the context of 37 C.F.R. § 42.23(b), does not mean proceed in a new direction with a new approach as compared to the positions taken in a prior filing." *IPR Trial Guide 2019*, p. 74.

Lastly, Petitioner received notice of infringement of the '294 Patent hence this Petition. PO currently has a lawsuit against Apple, Inc., that is currently dismissed without prejudice along with a tolling agreement where the case will be reopened once the IPR proceedings are resolved. Separately, PO provided Petitioner notice that it will pursue litigation against it once the IPR proceedings are complete.

PO requests the Director establish the "likelihood of success" standard for reviewing pre-institution evidence and reverse the DI because there can be no "likelihood of success" when Petitioner did not establish claim element [1.e] is found in the cited references. Furthermore, the Board legally erred by failing to require Petitioner to show that it had met the "good cause" requirement and prejudicing PO by allowing new claim construction on pre-institution reply.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies the service of Patent Owner DH International Ltd. served Patent Owner's Request for Director Review on the counsel of record for Petitioner Google LLC by filing this document through the P-TACTS, as well as delivering a copy via electronic mail to the following:

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CERTIFICATE OF COMPLIANCE

This Petition complies with the type-volume limitations as mandated in 37 C.F.R. § 42.24(a), totaling 15 pages.

Dated: April 7, 2025

By: /s/ *Robert Hart*
Robert Hart