

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner

v.

1LSS, INC.,
Patent Owner

Case IPR2025-01180
U.S. Patent No. 11,864,641

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 11,864,641**

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PETITIONER'S EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 11,864,641 B2 to Mora et al., issued January 9, 2024 (“the ’641 patent”)
1002	File History of U.S. Patent No. 11,864,641
1003	Declaration of Dr. Joshua Phinney in Support of Petition for <i>Inter Partes</i> Review of U.S. Patent No. 11,864,641
1004	<i>Curriculum Vitae</i> of Dr. Joshua Phinney
1005	U.S. Provisional Application No. 62/736,379 to Mora, filed September 25, 2018 (“Provisional”)
1006	U.S. Patent Application Publication No. 2016/0260532 A1 to Baca, published September 8, 2016 (“Baca”)
1007	Chinese Patent Application Publication No. 108023992 A to Zhu, published May 11, 2018 (“Zhu”)
1008	English Language Translation of Zhu
1009	Japanese Patent Application Publication No. 3200923 U to Kinshi, published November 12, 2015 (“Kinshi”)
1010	English Language Translation of Kinshi
1011	U.S. Patent No. 5,288,942 to Godfrey, issued February 22, 1994 (“Godfrey”)
1012	U.S. Patent No. 4,647,714 to Goto, issued March 3, 1987 (“Goto”)
1013	U.S. Patent Application Publication No. 2017/0354229 A1 to Berkley et al., published December 14, 2017 (“Berkley”)
1014	U.S. Patent No. 10,134,517 B2 to Baca, issued November 20, 2018 (“Baca Patent”)
1015	U.S. Patent No. 9,362,968 B1 to Haymond, issued June 7, 2016 (“Haymond”)

Exhibit No.	Description
1016	U.S. Patent No. 5,080,223 to Mitsuyama, issued January 14, 1992 (“Mitsuyama”)
1017	U.S. Patent Application Publication No. 2016/0072933 A1 to Cox, III, published March 10, 2016 (“Cox”)
1018	U.S. Patent No. 8,138,869 B1 to Lauder et al., issued March 20, 2012 (“Lauder”)
1019	U.S. Patent Application Publication No. 2011/0192857 A1 to Rothbaum et al., published August 11, 2011 (“Rothbaum”)
1020	Ho, A., “Mophie Hold Force Review – Modular iPhone 7 and 7 Plus cases,” MobileReviews Eh!, April 26, 2017, accessible at https://www.mobilereviews-eh.ca/mophie-hold-force-review-modular-iphone-7-and-7-plus-cases/ (last accessed June 18, 2025)
1021	Wayback Machine Archive of Exhibit 1020, archived June 6, 2017, accessible at https://web.archive.org/web/20170606185125/https://www.mobilereviews-eh.ca/mophie-hold-force-review-modular-iphone-7-and-7-plus-cases/ (last accessed July 15, 2025)
1022	U.S. Patent Application Publication No. 2016/0295981 A1 to Lay et al., published October 13, 2016 (“Lay”)
1023	U.S. Patent Application Publication No. 2019/0208878 A1 to Hyncek et al., published July 11, 2019 (“Hyncek”)
1024	“Burkley Magnetic Detachable Wallet Case for iPhone 7+: Handmade Turkish Leather w/ Excellent Magnets!”, Tech Reviewer, May 18, 2017, accessible at https://web.archive.org/web/20170825170230/https://tech-reviewer.com/2017/05/18/burkley-magnetic-detachable-wallet-case-iphone-7-handmade-turkish-leather-w-excellent-magnets/ (last accessed July 15, 2025)

Exhibit No.	Description
1025	“BUDU - A module phone case that adapts to you!”, Indiegogo Campaign, accessible at https://www.indiegogo.com/projects/budu-a-modular-phone-case-that-adapts-to-you#/ (last accessed July 15, 2025)
1026	“Updates” Tab from “BUDU - A module phone case that adapts to you!”, Indiegogo Campaign, accessible at https://www.indiegogo.com/projects/budu-a-modular-phone-case-that-adapts-to-you#/updates/all (last accessed July 15, 2025)
1027	U.S. Patent No. 4,851,610 to LeBlanc et al., issued July 25, 1989 (“LeBlanc”)
1028	U.S. Patent No. 5,941,375 to Kamens et al., issued August 24, 1999 (“Kamens”)
1029	U.S. Patent Application Publication No. 2012/0228168 A1 to Kitchen, issued September 13, 2012 (“Kitchen”)
1030	U.S. Patent Application Publication No. 2012/0326819 A1 to Malanczyj et al., issued December 27, 2012 (“Malanczyj”)
1031	U.S. Patent No. 5,718,329 to Ippolito et al., issued February 17, 1998 (“Ippolito”)
1032	U.S. Patent Application Publication No. 2006/0279098 A1 to Shipley et al., published December 14, 2006 (“Shipley”)
1033	Excerpts from Griffiths, D., <i>Introduction to Electrodynamics</i> , Third Edition (1999)
1034	Declaration of Timothy L. Tang
1035	U.S. Patent Application Publication No. 2012/0168483 A1 to Jambunathan et al., published July 5, 2012 (“Jambunathan”)

CLAIM LISTING

[1.P]	A wallet for attachment to a mobile device comprising:
[1.A]	a body defining a compartment and having a device side surface;
[1.B]	a first arrangement of magnetic material having a first region exposing a first polarity magnetic field at the device side surface and a second adjacent region exposing an opposite polarity magnetic field at the device side surface;
[1.C]	a second arrangement of magnetic material having a first region exposing a first polarity magnetic field at the device side surface and a second adjacent region exposing an opposite polarity magnetic field at the device side surface; and
[1.D]	a ferromagnetic shield between the first and second arrangements and the compartment;
[1.E.1]	wherein the first arrangement and the second arrangement are physically separated on the wallet by a region of nonmagnetic material,
[1.E.2]	the region of nonmagnetic material having a maximum cross dimension greater than a distance between any two immediately adjacent first polarity and opposite polarity regions in the first or second arrangement; and
[1.F.1]	wherein the first and second arrangements, in use, concurrently magnetically couple the wallet to a mobile device and
[1.F.2]	wherein the first and second arrangements cause the wallet to adopt a specific orientation on the mobile device.

[2]	The wallet of claim 1 wherein the body defines at least one content removal slot.
[3]	The wallet of claim 1 wherein an attractive force between the first arrangement, the second arrangement and complementary arrangement of magnets associated with the mobile device are sufficient to support a weight of the mobile device.
[4]	The wallet of claim 1 wherein a spacing between the first region and the second region in the first arrangement is less than 2 mm.
[5.P]	A wallet for attachment to a mobile device comprising:
[5.A]	a body defining a compartment and having a device side surface;
[5.B]	a first arrangement of magnetic material having a first region exposing a first polarity magnetic field at the device side surface and a second adjacent region exposing an opposite polarity magnetic field at the device side surface;
[5.C]	a second arrangement of magnetic material having a first region exposing a first polarity magnetic field at the device side surface and a second adjacent region exposing an opposite polarity magnetic field at the device side surface; and
[5.D]	a metallic plate between the first arrangement and the compartment;
[5.E.1]	wherein the first arrangement and the second arrangement are physically separated on the wallet by a region of nonmagnetic material,

[5.E.2]	the region of nonmagnetic material having a maximum cross dimension greater than a distance between any two immediately adjacent first polarity and opposite polarity regions in the first or second arrangement; and
[5.F.1]	wherein the first and second arrangements, in use, concurrently magnetically couple the wallet to a mobile device and
[5.F.2]	wherein the first and second arrangements cause the wallet to adopt a specific orientation on the mobile device.
[6]	The wallet of claim 1 wherein the device side surface is substantially planar and an attachment surface of the mobile device is also substantially planar.
[7]	The wallet of claim 1 wherein the first and second arrangement permit coupling to the mobile device in exactly one orientation.
[8]	The wallet of claim 1 wherein the first and second arrangement permit coupling to the mobile device in exactly two orientations.
[9]	The wallet of claim 1 further comprising: a finger loop on a surface opposite the device side surface.
[10]	The wallet of claim 1 wherein the body defines an opening into the compartment and wherein a material defining the opening tapers towards a long axis of the body at the opening to expose a content of the compartment at the opening.
[11.P]	A wallet for attachment to a mobile device comprising:
[11.A]	a body defining a compartment and having a device side surface;

[11.B]	a first arrangement of magnetic material having a first region exposing a first polarity magnetic field at the device side surface and a second adjacent region exposing an opposite polarity magnetic field at the device side surface;
[11.C]	a second arrangement of magnetic material having a first region exposing a first polarity magnetic field at the device side surface and a second adjacent region exposing an opposite polarity magnetic field at the device side surface; and
[11.D]	wherein the first magnetic arrangement has at least one of a different orientation or a different geometric pattern than the second arrangement; and
[11.E.1]	wherein the first and second arrangements, in use, concurrently magnetically couple the wallet to a mobile device and
[11.E.2]	wherein the first and second arrangements cause the wallet to adopt a specific orientation on the mobile device.

I. INTRODUCTION

Apple Inc. petitions for *inter partes* review of claims 1-11 of U.S. Patent No. 11,864,641 (“the ’641 patent”; EX1001). The ’641 patent claims wallets that are attachable to a mobile device using particular configurations of magnets. Before the ’641 patent, the claimed (i) magnetic configurations, (ii) wallets, and (iii) use of such configurations with such wallets were well known. Indeed, the ’641 patent concedes that it uses prior-art magnetic configurations to attach prior-art accessories to a mobile device. EX1001, 8:15-20. And, before the claims issued, the Board confirmed in an *ex parte* appeal during prosecution that wallets that incorporate the claimed magnetic configurations to attach to a mobile device were obvious. EX1002, 437-60.

The Board’s findings in that appeal are highly instructive regarding the alleged patentability of the claims. It affirmed many of the examiner’s positions but did not sustain the following rejections, leading to allowance of the three independent claims of the ’641 patent (claims 1, 5, and 11). First, the Board found that the examiner failed to identify a ferromagnetic shield (originally recited in dependent claim 2, now in independent claim 1) or a magnetic plate (originally recited in dependent claim 6, now in independent claim 5) arranged between one or more magnetic arrangements and the claimed “compartment” that holds credit cards and the like. EX1002, 455-56. But, by the time of the ’641 patent, shielding

to protect the data encoded in a credit card's magnetic strip from being corrupted by magnetic fields was well known, as evidenced by the Goto patent that issued in 1987. EX1012, Abstract.

Second, the Board found that the examiner's reliance on the Levy reference (not relied on here) to address the "first and second [magnetic] arrangements" which "cause the wallet to adopt a specific orientation on the mobile device" of independent claim 11 was flawed because Levy teaches mechanical structures, not magnetics, for orientation purposes. EX1002, 457-59. However, this limitation is recited in another claim that the Board found was obvious based on a different rejection. EX1002, 448-49. Thus, it was the way that the examiner presented the rejection, not a lack of prior art, that led to the Board's determination.

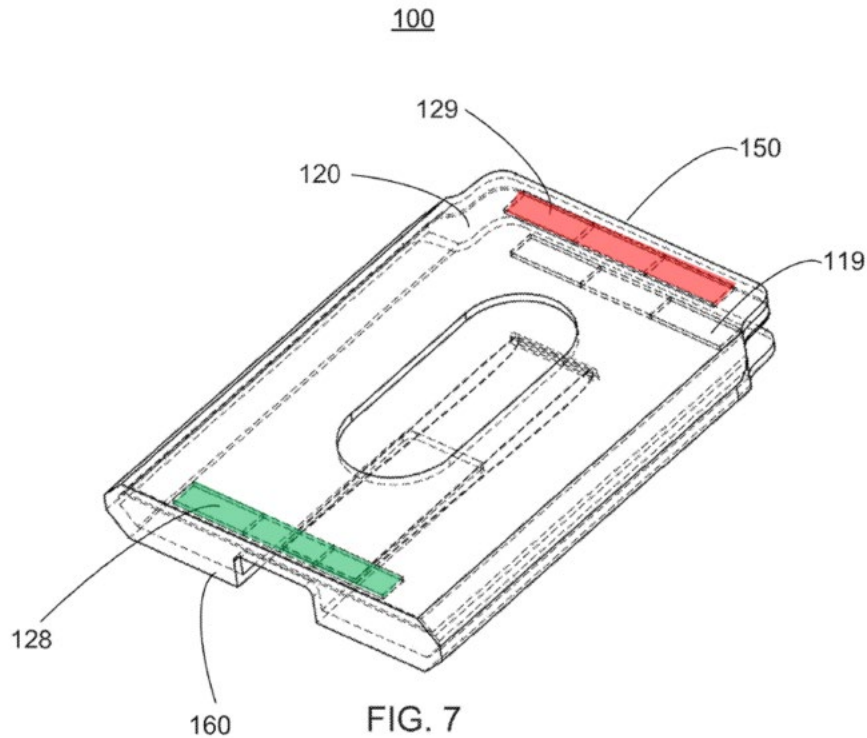
The Petition demonstrates that these features (as well as all the other claim features) were obvious before the '641 patent. Ground 1 relies on Berkley and Baca, which the Board already found to be obvious to combine, along with prior art that was not previously considered. Grounds 2 and 3 rely primarily on prior art that was not previously considered.

II. THE '641 PATENT

A. Summary

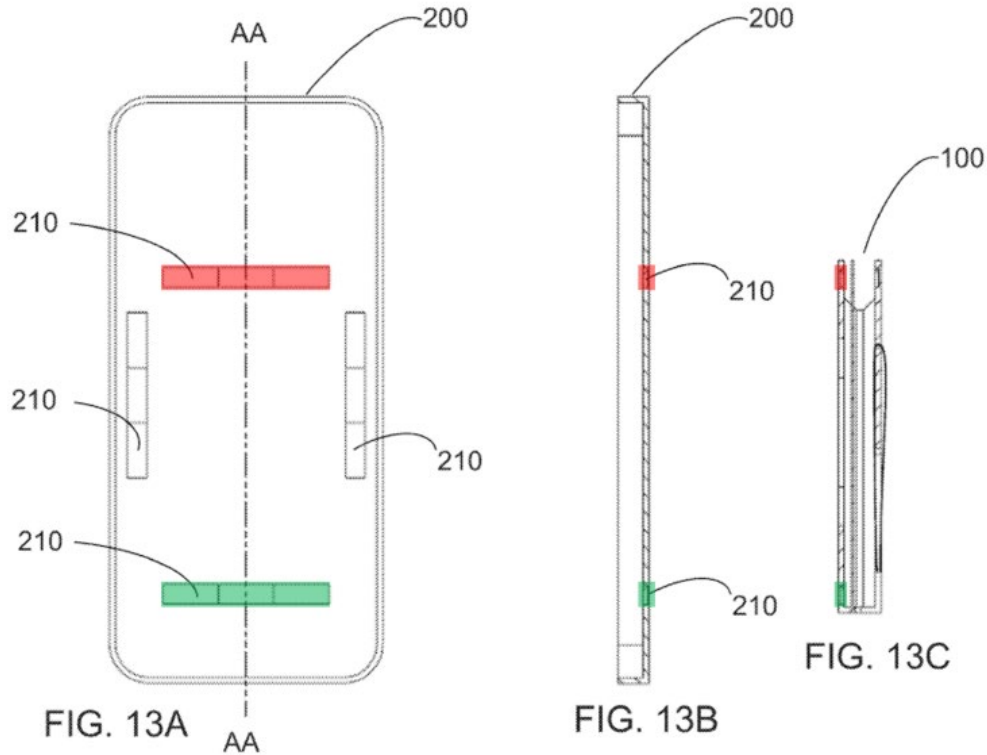
The '641 patent describes a wallet having magnetic arrangements that enable the wallet to connect to corresponding magnetic arrangements on a mobile device

or a protective case for a mobile device. EX1001, Abstract, 1:50-2:12. Figure 7 below shows an example wallet 100 that includes magnets 128 (green) and 129 (red) on the surface of the wallet that couples to the surface of a mobile device or protective case. EX1001, 8:50-56.



EX1001, FIG. 7 (annotated).

Figures 13A-C below show an “electronic display device case 200” having magnetic arrangements 210 (red/green) that attach to and align with the magnetic arrangements of wallet 100. EX1001, 9:46-58.



EX1001, FIGs. 13A-C (annotated).

Regarding the magnetic arrangements, Figures 43A-43I depict various self-aligning, magnetic arrangements for attaching the wallet to *the mobile device or the case*. EX1001, 18:3-44. These exact arrangements are disclosed in Baca, which is 1LSS's own prior art that published more than two years before the earliest possible priority date of the '641 patent.¹ Compare EX1001, FIGs. 43A-43I, with

¹ Baca was filed as U.S. Patent Application No. 15/059,163, published as U.S. Patent Application Publication No. 2006/0206532 on September 8, 2016, EX1006, (21), (43), and issued as U.S. Patent No. 10,134,517. EX1014.

EX1006, FIGs. 4A-4I. The '641 patent cross-references and incorporates-by-reference Baca. EX1001, 1:18-21, 3:42-46, 8:14-20, 14:33-34; *see also* EX1005, ¶¶4, 46. The '641 patent thus applies Baca's prior-art, self-aligning magnetic arrangements to a conventional wallet. EX1003, ¶¶82-92.

The '641 patent also describes disposing a magnetic-shielding material between a wallet compartment and the magnetic arrangements. EX1001, 8:28-45. Although the '641 patent does not explain the need for such a material, it was known for decades that cards having magnetic strips (such as credit cards) are susceptible to data loss in the presence of a magnetic field. EX1012, 2:14-21; EX1027, 1:12-42. The '641 patent thus applied well-known magnetic-shielding material in the claimed wallet. EX1003, ¶¶69-81.

B. Prosecution History

The application leading to the '641 patent was the subject of several rejections that culminated in an *ex parte* appeal in which the Board sustained many rejections but identified some shortcomings in the examiner's analysis. Instead of addressing those shortcomings, the examiner issued the patent. Apple's Grounds address those shortcomings and demonstrate the claims were obvious. EX1003, ¶¶93-107.

The Baca reference played a central role during prosecution. 1LSS both relied on and distanced itself from Baca's teachings. Rebutting rejections for lack

of written-description support, 1LSS argued that paragraph 134 of the specification and Figure 43I provide written-description support for prosecution claims 8 and 9, which recited that the magnetic arrangements permit coupling in exactly one orientation or exactly two orientations, respectively. EX1002, 145-46, 193-94. Paragraph 134 of the specification and Figure 43I are substantively the same as paragraph 84 and Figure 4I of Baca, respectively. *Compare* EX1002, 111 (¶134), FIG. 43I, *with* EX1006, ¶84, FIG. 4I. 1LSS thus relied on disclosures from Baca to show written-description support for the claimed magnetic arrangements.

But when faced with prior-art rejections, 1LSS sought to distance itself from Baca's teachings, arguing that Baca is non-analogous art. EX1002, 340-41. Relevant here, 1LSS appealed to the Board certain rejections based on various combinations of Berkley and Baca with Levy, Sartee, or Gluck. EX1002, 440 (table showing examiner's rejections). Generalizing, the rejections were based on Berkley's teachings of a wallet that magnetically couples to a mobile device, EX1002, 441, 444, combined with Baca's teachings of magnetic arrangements for affixing a mobile device to a surface, EX1002, 444-45. The examiner applied Sartee and Gluck to address the "ferromagnetic shield" of prosecution claim 2 and the "metallic plate" of prosecution claim 6, respectively. EX1002, 374-76. And for independent prosecution claim 12, the examiner relied on Levy for the limitation "the first and second arrangements, in use, concurrently magnetically couple the

wallet to a mobile device and wherein the first and second arrangements cause the wallet to adopt a specific orientation on the mobile device” (the “specific orientation” limitation). EX1002, 378-79.

In its decision, the Board confirmed that many claims and claim elements were obvious based on Berkley and Baca. EX1002, 459-60. To start, the Board correctly found that Baca is analogous art under both prongs of the test (i.e., same field of endeavor as the ’641 patent and reasonably pertinent to the problems facing the ’641 inventors). EX1002, 447-48. The Board also found that it would have been obvious to combine Berkley and Baca, and that all but the following three limitations were taught by the combination: (1) the “ferromagnetic shield” in prosecution claim 2; (2) the “metallic plate” in prosecution claim 6; and (3) the “specific orientation” limitation in prosecution claim 12. The table below summarizes the Board’s findings:

Prosecution Claims	Board’s Decision
1, 3-5, 7-9	Taught by Berkley-Baca. EX1002, 444-53.
2	“[T]he Examiner has not adequately explained how combining the teachings of Sartee with Berkley and Baca accounts for the limitation of claim 2.” EX1002, 456. ²
6	“The Examiner does not cite any evidence

² Emphasis is added throughout, except where otherwise indicated.

	from Gluck that would cure the deficiencies in the rejection of claim 2. Therefore, we do not sustain the rejection of claim 6 for the same reasons discussed above for claim 2.” <i>Id.</i>
12	“The rejection relies on Levy to satisfy the second wherein clause reciting that the first and second arrangements ‘cause the wallet to adopt a specific orientation on the mobile device.’ ... As discussed above in rejection 1, we find that Levy’s protuberances and recesses, not the magnets, cause the orientation of the electronic device in mount 106. In the Answer, the Examiner changes position and relies on Baca with Levy to satisfy the second wherein clause.” EX1002, 459.

Notably, the “specific orientation” limitation of prosecution claim 12 (which issued as independent claim 11) is also recited in independent claim 1, and the Board found that Baca teaches this limitation. EX1002, 444. It was thus the mapping in the examiner’s rejection, not shortcomings of the prior art, that led the Board to reverse the rejection of claim 12.

In response to the Board’s decision, 1LSS amended independent claim 1 to incorporate claim 2 and rewrote claim 6 to be independent. Instead of identifying

prior art that taught the magnetic shielding limitations and re-framing the rejection of claim 12, the examiner allowed the application to issue. EX1002, 462-529.

C. Person of Ordinary Skill in Art (POSA)

A POSA at the time of the '641 patent was filed would have had a bachelor's degree in mechanical or electrical engineering, or industrial design, and would have had at least two years of experience with magnetics design for consumer products. EX1003, ¶¶108-109.

III. CLAIM CONSTRUCTION

Absent lexicography or disavowal, claim terms in an IPR are given their plain and ordinary meaning in light of the specification and prosecution history. *Sisvel Int'l S.A. v. Sierra Wireless, Inc.*, 81 F.4th 1231, 1236 (Fed. Cir. 2023). The Board should apply the plain and ordinary meaning to all claim terms other than those discussed below.

A. “wallet”

The claims recite the term “wallet.” The '641 patent broadly defines “wallet” in terms of what it can hold as opposed to a form factor or physical structure: “a ‘wallet’ should be understood to mean any apparatus for holding at least one of a credit card, cash, identification, a check, a badge, a picture, a key, a piece of paper, a coupon, business cards, and combinations thereof” or “for containing any objects of similar size and dimensions as these items.” EX1001, 7:3-11. The Board should apply the '641 patent's definition of the term “wallet.”

EX1003, ¶¶110-112.

B. “compartment”

The claims recite “compartment.” The Board previously construed this term during prosecution based on a dictionary definition: “The ordinary meaning [of] compartment is ‘a part or space marked or partitioned off.’” EX1002, 455.

Petitioner applies this construction in the Grounds below, but notes that the prior art teaches a “compartment” under any reasonable construction of this term.

EX1003, ¶113.

IV. GROUNDS

Apple requests IPR on the following Grounds under 35 U.S.C. § 103:

Ground	Claims	Combination of References
1A	1-8	Berkley-Baca-Goto
1B	3	Berkley-Baca-Goto-Cox
1C	11	Berkley-Baca
1D	9	Berkley-Baca-Goto-Haymond
1E	10	Berkley-Baca-Goto-Mitsuyama
2A	1-7, 11	Zhu-Kinshi-Goto
2B	3	Zhu-Kinshi-Goto-Cox
2C	4	Zhu-Kinshi-Goto-Lauder
2D	9	Zhu-Kinshi-Goto-Haymond
2E	10	Zhu-Kinshi-Goto-Mitsuyama

3A	11	Kinshi
3B	1-3, 5, 6, 8	Kinshi-Goto
3C	3	Kinshi-Goto-Cox
3D	4	Kinshi-Goto-Lauder
3E	9	Kinshi-Goto-Haymond
3F	10	Kinshi-Goto-Mitsuyama

Each reference is prior art under §§102(a)(1) and (a)(2):

- US 2017/0354229 (“Berkley”) was filed June 9, 2017, and published December 14, 2017.
- US 2016/0260532 (“Baca”) was filed March 2, 2016, and published September 8, 2016.
- US4,647,714 (“Goto”) was filed December 28, 1984, and issued March 3, 1987.
- US2016/0072933 (“Cox”) was filed September 4, 2015, and published March 10, 2016.
- US9,362,968 (“Haymond”) was filed June 24, 2015, and issued June 7, 2016.
- US5,080,223 (“Mitsuyama”) was filed May 30, 1990, and issued January 14, 1992.
- CN108023992 (“Zhu”) was filed January 8, 2018, and published May

11, 2018. Petitioner cites to the certified English translation of Zhu (EX1008).

- JP3200923U (“Kinshi”) was filed August 31, 2015, and published November 12, 2015. Petitioner cites to the certified English translation of Kinshi (EX1010).
- US8,138,869 (“Lauder”) was filed July 22, 2011, and issued March 20, 2012.

Each reference is analogous art: it is in the same field (e.g., accessories for mobile devices, wallets, and/or mechanisms for attaching accessories to mobile devices) as the ’641 patent, is reasonably pertinent to the problems (e.g., arranging accessories, magnetic coupling, magnetic shielding) of the ’641 patent, or both. EX1003, ¶¶15-17, 114-144.

V. COMPARISON OF INDEPENDENT CLAIMS

Claims 1 and 5 are the same but for [1.D] and [5.D]. [1.D] recites “a ferromagnetic shield between the first and second arrangements and the compartment,” whereas [5.D] recites “a metallic plate between the first arrangement and the compartment.” EX1003, ¶204.

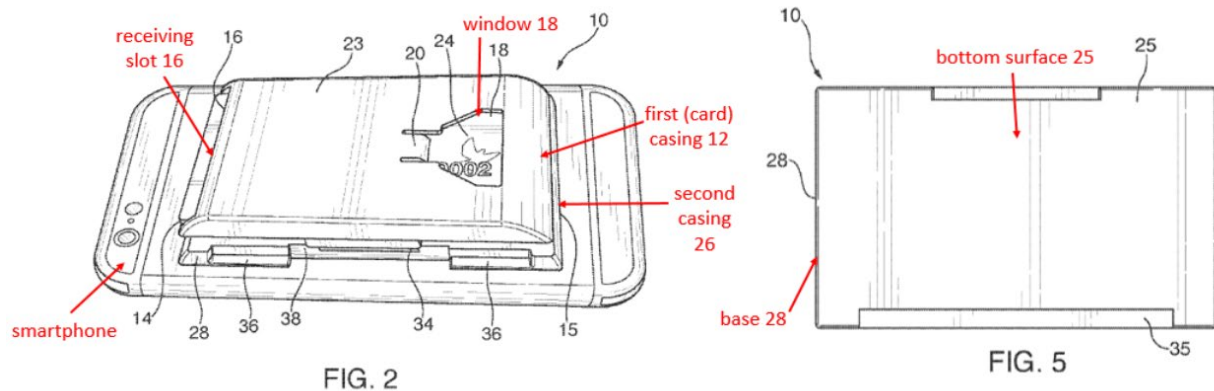
Regarding claim 11, [11.P]-[11.C] are the same as [1.P]/[5.P]-[1.C]/[5.C], and [11.E.1]-[11.E.2] are the same as [1.F.1]/[5.F.1]-[1.F.2]/[5.F.2]. Claim 11 differs from claims 1 and 5 because it: (1) does not recite the “ferromagnetic

shield”/“metallic plate” of [1.D]/[5.D], and the “nonmagnetic material” limitations [1.E.1]/[5.E.1]-[1.E.2]-[5.E.2]; but (2) it recites that the first and second arrangements have “at least one of a different orientation or a different geometric pattern” in [11.D] (which is not in claims 1 and 5). EX1003, ¶¶322-324.

VI. 1A: BERKLEY-BACA-GOTO RENDERS OBVIOUS CLAIMS 1-8

A. Berkley

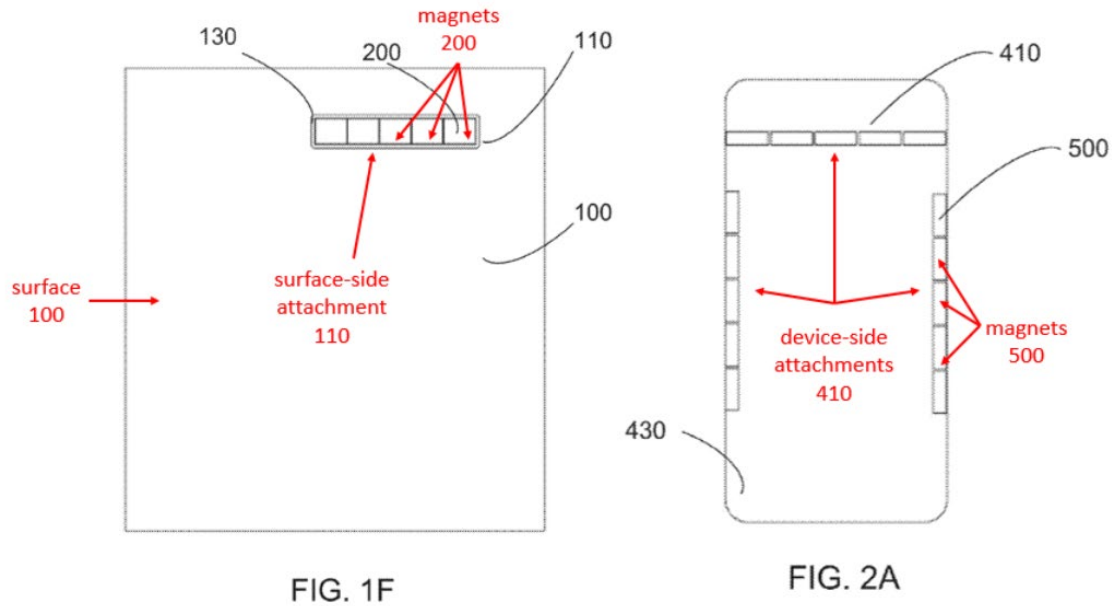
Berkley discloses a wallet compact that attaches to a smartphone and stores credit cards, identification cards, and cosmetics. EX1013, ¶2; EX1003, ¶¶115-116. Berkley’s wallet compact 10 includes a first casing 12 (a card casing) disposed on top of a second casing 26. EX1013, ¶¶20, 23. First casing 12 includes a receiving slot (opening) 16 and a window 18 that allows a user to access the cards. EX1013, ¶¶20, 22. Second casing 26 is formed with base 28 having a flat bottom surface so that an attachment mechanism can be provided on bottom surface 25. EX1013, ¶¶26-28. Berkley describes an embodiment that disposes a magnet in the base so that the wallet compact can “stick” to magnets attached to a smartphone. EX1013, ¶29.



EX1013, FIGs. 2 and 5 (annotated).

B. Baca

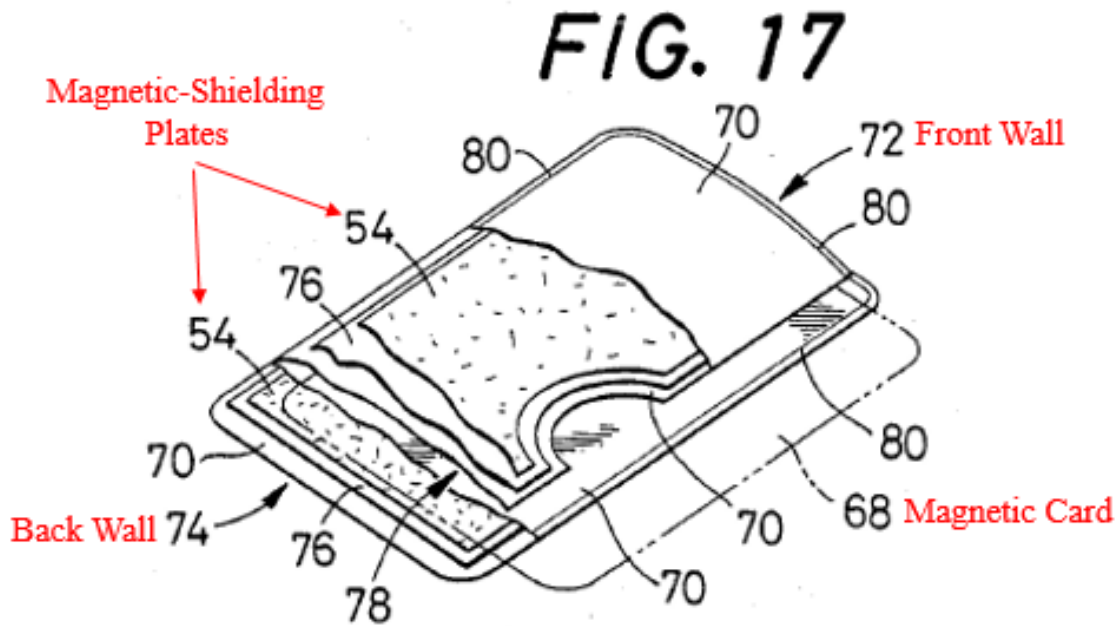
Baca describes magnetic arrangements for mounting an electronic device to another surface. EX1006, ¶3; EX1003, ¶¶117-119. Baca's arrangements include a surface-side attachment 110 including a plurality of magnets 200 and a respective device-side attachment 410 that includes a corresponding plurality of magnets 500. EX1006, ¶¶68, 72. Baca shows that device-side attachment 410 may be embedded in the case of an electronic device while surface-side attachment 110 may be "permanently or temporarily affix[ed]" by "double-sided adhesive tape" to virtually anything, including surfaces made of "wood, fabric, glass, painted wall, leather and aluminum." EX1006, ¶¶62, 70, 72, 106. The magnets 200, 500 within each attachment 110, 410 include magnets of alternating polarities arranged to be "self-aligning." EX1006, ¶¶83-84.



EX1006, FIGs. 1F and 2A (annotated).

C. Goto

Goto discloses “magnetic card holders” that include “magnetic shielding” plates, wherein the magnetic-shielding plates are made of an “electrodeposited iron foil.” EX1012, Abstract, 3:9-40 (describing iron foil), 7:20-23 (same), 11:44-12:68, FIGs. 16-18 (describing magnetic card holders); EX1003, ¶¶129-132. Goto explained (in 1984) that such shielding is needed because the data stored on magnetic cards may be negatively affected or become unusable when exposed to a magnetic field. EX1012, 2:14-21. Figure 17 below shows one of Goto’s magnetic-card holders (others are shown in Figures 16 and 18). Figure 17’s holder “is formed of a front wall 72 and a rear wall 74” inside each of which is “a magnetic shielding plate 54” that is “slightly smaller than the plane of” their respective walls. EX1012, 12:9-19.



EX1012, FIG. 17 (annotated).

Figure 17 shows that a magnetic card 68 is inserted into the holder, and thus the holder is a “wallet” per the ’641 patent. Goto discloses that a magnetic card 68 “accommodated” in this holder is “protected...due to the magnetic shielding plate 54 in the front wall 72 and that of the rear wall 74.” EX1012, 12:20-24. Goto explains that even when the holder “is exposed to [a] magnetic force line, the card can not be affected.” EX1012, 12:24-26.

D. Motivation to Combine

1. Berkley-Baca

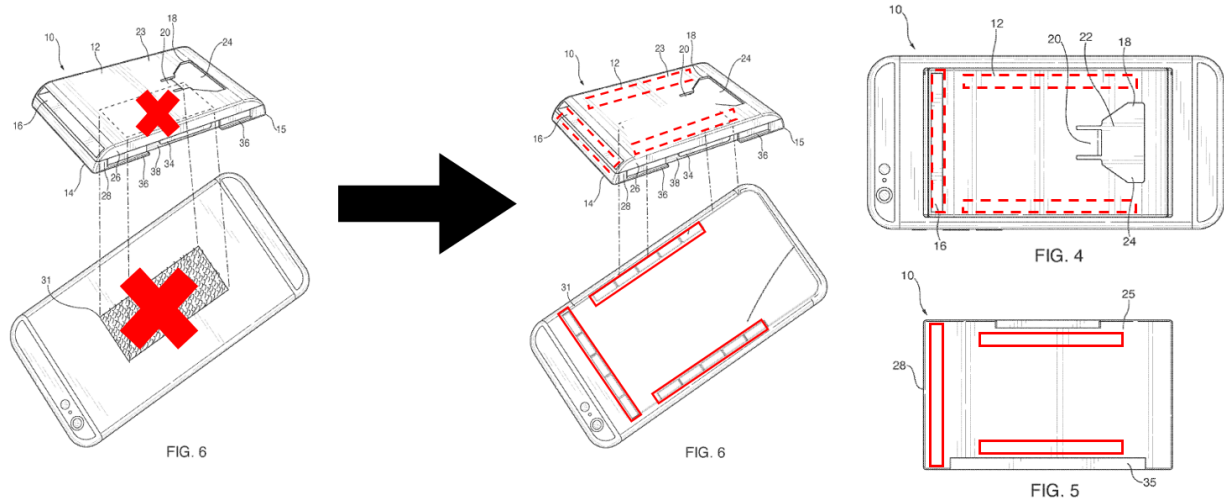
A POSA would have been motivated to modify Berkley to use Baca’s magnetic arrangements to attach Berkley’s wallet to a mobile device, as the Board

previously found. EX1002, 447-49³; EX1003, ¶¶145-146. Berkley discloses various ways to attach its wallet to a mobile device, including magnets in the base of the wallet that “stick” to “corresponding magnets” in the handheld device. EX1013, ¶¶27, 29. Because Berkley does not provide details for how to implement this magnetic attachment, a POSA would have looked to Baca, which teaches using magnets. EX1003, ¶¶147-148.

Baca describes arrangements of magnets for “rapidly mounting and unmounting” an electronic display device “to various surfaces.” EX1006, ¶3. Baca’s describes disposing corresponding arrangements of magnets on opposing surfaces (e.g., an electronic display device and some other surface). EX1006, ¶68. Such arrangements can attached to virtually anything, including surfaces made of “wood, fabric, glass, painted wall, leather and aluminum” merely using, for example, “double-sided adhesive tape.” EX1006, ¶¶70, 106. Baca also describes integrating magnets directly into the electronic display device. EX1006, ¶62. Thus, Baca discloses a general technique for using arrangements of magnets to attach an electronic device to other items. EX1003, ¶149.

³ The Board correctly rejected 1LSS’s argument that Baca is non-analogous art, EX1002, 447, particularly because the ’641 patent incorporates-by-reference Baca to provide support for its magnetic arrangements, EX1001, 8:14-19.

A POSA would have been motivated to incorporate Baca's magnets into Berkley's wallet to realize the magnetic attachment mechanism expressly taught by Berkley. EX1013, ¶29. As shown below, such a modification would merely implement Berkley's teaching to use magnets by placing Baca's magnetic arrangements shown in Figure 2B of Baca on the backside of Berkley's device. For the attachment mechanism to work as taught by Baca, corresponding arrangements of magnets would have also been provided on the bottom surface of Berkley's wallet, as shown. EX1003, ¶¶150-151.



EX1003, ¶151, FIG. B (annotating Berkley, FIGs. 4-6 to show combination).⁴

⁴ Dr. Phinney's figures (e.g., Figure B) are for illustrating the modifications/combinations, not for suggesting bodily incorporation is required.

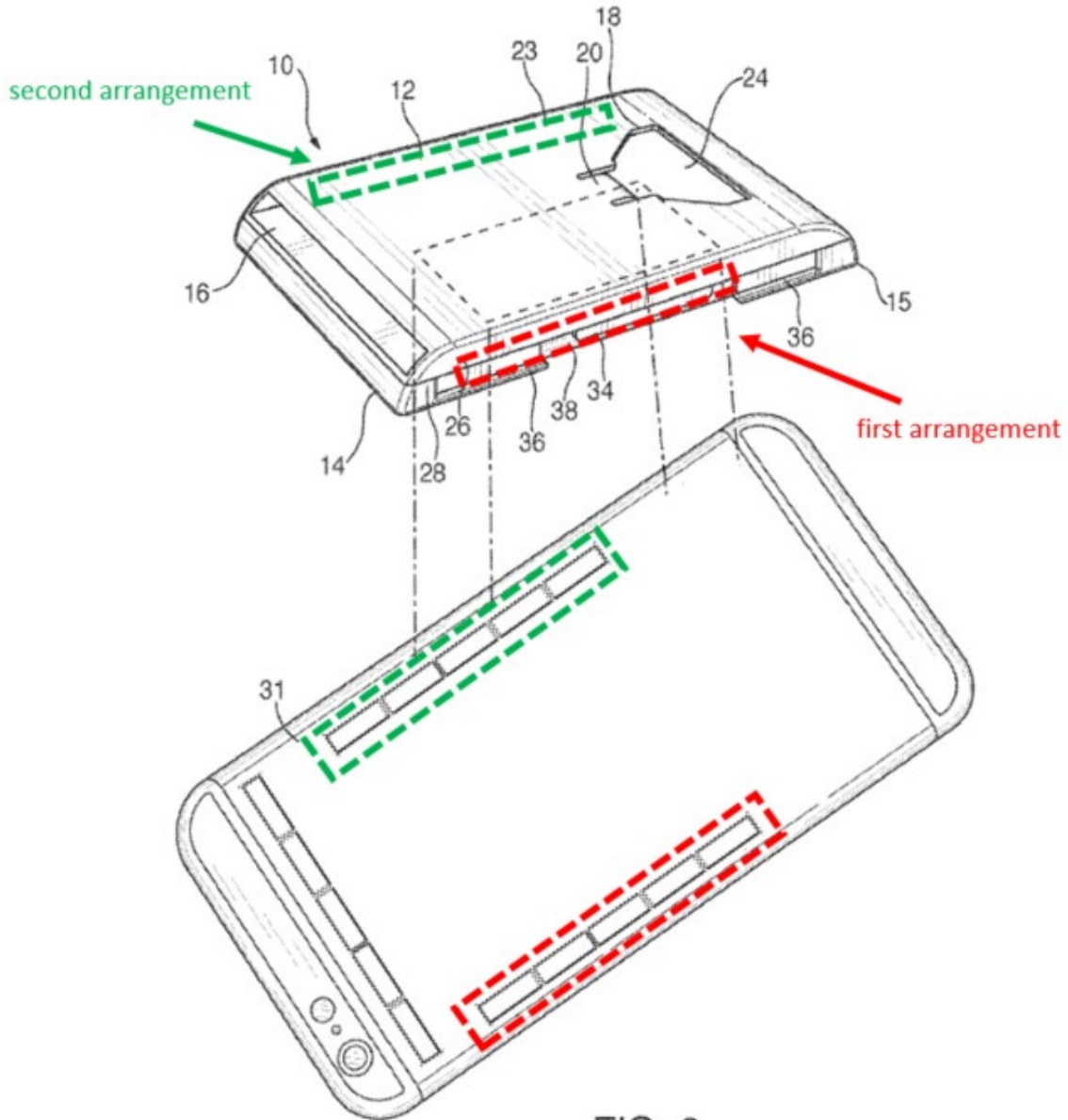


FIG. 6

EX1003, ¶151, FIG. C (Berkley, FIG. 6 annotated to show Baca's magnets).

In addition to the Board's prior findings, this combination is exemplary of several *KSR* rationales, including: (1) Berkley's express teaching to use a magnetic attachment; (2) combining the prior-art elements of Berkley's wallet with Baca's magnetic arrangements according to known methods for affixing the arrangements

to the wallet and mobile device, yielding the predictable result of a wallet that is magnetically attachable to a mobile device; and (3) using Baca's known technique to attach a mobile device to an item via magnetic arrangements to improve Berkley's similar devices in the same way. EX1003, ¶152.

A POSA would have had a reasonable expectation of success in modifying Berkley with Baca. Baca's teachings make such a combination exceedingly predictable, describing that "[s]urface-side attachment 110 can be" "permanently or temporarily affix[ed] to" any "surface 100" using, for example, "double-sided adhesive tape." EX1006, ¶70. Thus, a POSA would have been motivated to place Baca's magnetic surface-side attachments 110 onto the bottom surface 25 of Berkley's wallet to achieve Berkley's disclosure of using magnets. EX1002, 282; EX1003, ¶153.

2. Berkley-Baca-Goto

The Board found that it would have been obvious to combine Berkley and Baca, and that Berkley-Baca teaches every element of issued claims 1 and 5 except for the claimed "ferromagnetic shield" and "metallic plate," which were recited by original dependent claims 2 and 6 during prosecution. *See* EX1002, 447-49, 454-56. Goto, which was not before the Examiner during prosecution of the '641 patent, teaches these elements. EX1003, ¶154.

A POSA would have been motivated to modify the Berkley-Baca wallet to

include Goto's iron-foil, magnetic-shielding plates to avoid erasing data stored magnetically on cards. EX1003, ¶¶155-157. Goto teaches such shielding is needed because the data stored on magnetic cards may be negatively affected or become unusable when exposed to a magnetic field. EX1012, 2:14-21. To avoid such damage, Goto includes magnetic-shielding plates made of iron foil embedded within the front and back walls of a "wallet" that holds cards. EX1012, 12:9-27. Goto teaches embedding the magnetic-shielding plates—formed via electrodeposition of a thin iron foil—as layers that sit beneath various materials used for wallets, such as leather and plastic. EX1012, 11:48-55, 12:9-19.

The problem of cards with magnetically stored data being susceptible to corruption and erasure when exposed to magnets was known long before the '641 patent. EX1003, ¶¶69-81, 158. Cards stored in the Berkley-Baca wallet would be susceptible to this type of magnetic damage, at least due to their proximity to Baca's magnets used to attach Berkley's wallet to a mobile device. *Id.*

A POSA would have been motivated to modify the Berkley-Baca wallet to include Goto's magnetic-shielding plate on or embedded as a layer within (at least) the bottom surface of Berkley's base 28—between the compartment that holds cards and Baca's magnets—to prevent potential magnetic damage caused by Baca's magnets. This is nothing more than the use of a known technique (magnetic shields) to improve a similar device (wallet) in the same way or applying a known

technique (shields) to a known device (wallet) ready for improvement to yield predictable results. Such a modification would predictably result in the Berkley-Baca wallet protecting cards from magnetic damage. EX1003, ¶159.

A POSA would have had a reasonable expectation of success in making this modification because it simply combines prior art elements (wallet and magnetic shielding) according to known methods to achieve the predictable result of protecting cards from magnetic damage. Further, the modification applies a known technique (magnetic shielding) to improve a similar wallet in the same way as Goto. EX1003, ¶160.

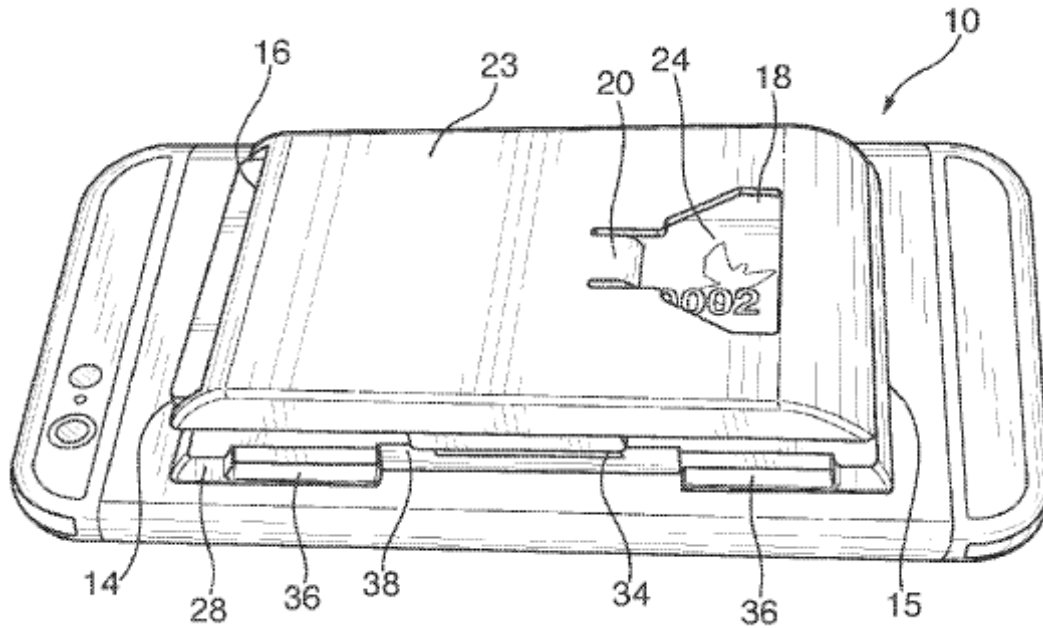
E. Claims 1, 5

1. Claim 1

a. [1.P]

Berkley discloses [1.P]. EX1003, ¶¶161-162; EX1002, 447-49. Notably, 1LSS explicitly stated that a “mobile device” is not a structural limitation or requirement of the claims during prosecution. EX1002, 195. Regardless, Berkley discloses a “cosmetic wallet compact comprising a housing” and an “attachment means ... to attach the cosmetic wallet compact to a handheld device.” EX1013, Abstract. Berkley’s wallet compact 10 “accommodates credit cards,” “identification cards,” and “paper bills,” and “selectively attaches to and detaches from the back surface of a handheld device, such as a smartphone.” *Compare* EX1013, ¶¶2, 5, 23 *with* EX1001, 7:3-7. Berkley’s cosmetic wallet 10 attaches to a

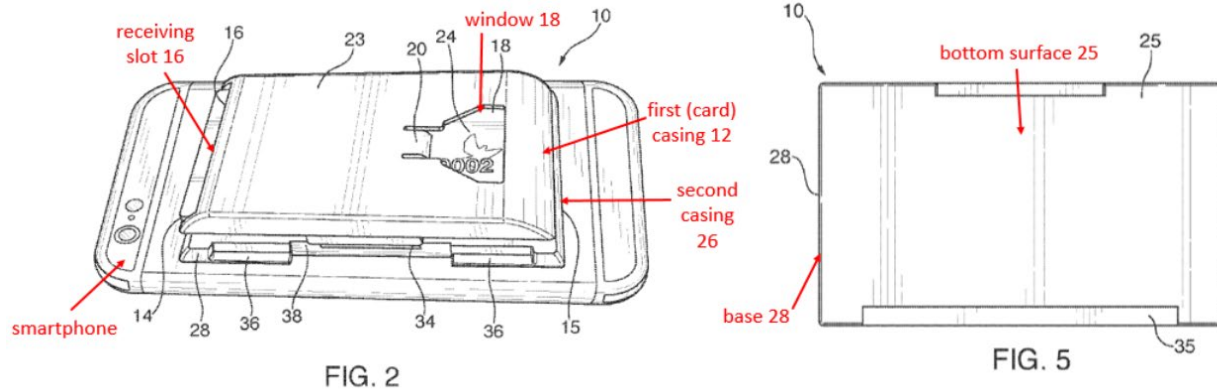
mobile device via “a magnet that is placed on the base of the device” that
“stick[s]” to a set of corresponding magnets” on the mobile device. EX1013, ¶29.



EX1013, FIG. 2.

b. [1.A]

Berkley discloses [1.A]. EX1003, ¶¶163-164; EX1002, 447-49. Berkley’s wallet 10 includes “a card casing or first casing 12 having an interior cavity.” EX1013, ¶20. First casing 12 “accommodate[s] a combination of at least two to four credit card(s), identification card(s), and one or more folded paper bills.” EX1013, ¶23. Second casing 26, attached to first casing 12, includes a “base 28 that rests against and is fastened to a handheld device.” EX1013, ¶24.

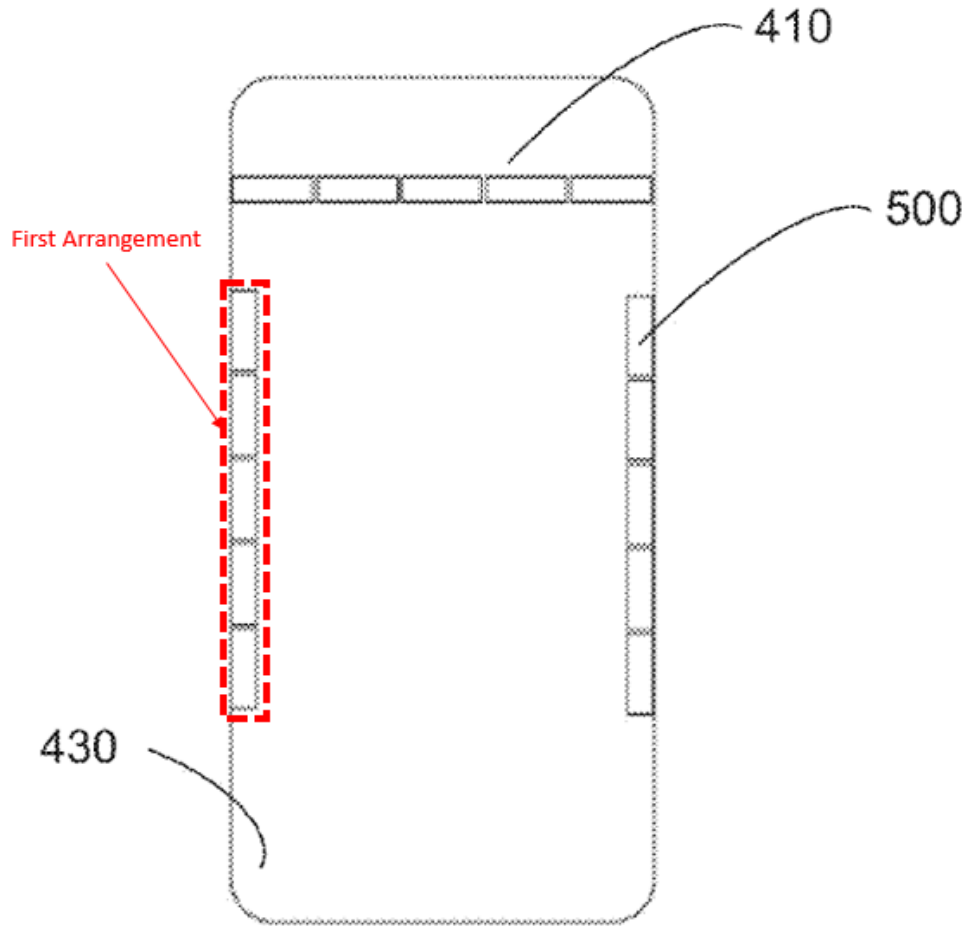


EX1013, FIGs. 2, 5 (annotated).

Berkley's first casing 12 and base 28 together meet the claimed "body" "having a device side surface" (bottom surface 25). Berkley's interior cavity of the first casing 12 that is configured to store cards and paper bills meets the claimed "compartment." EX1003, ¶¶163-164.

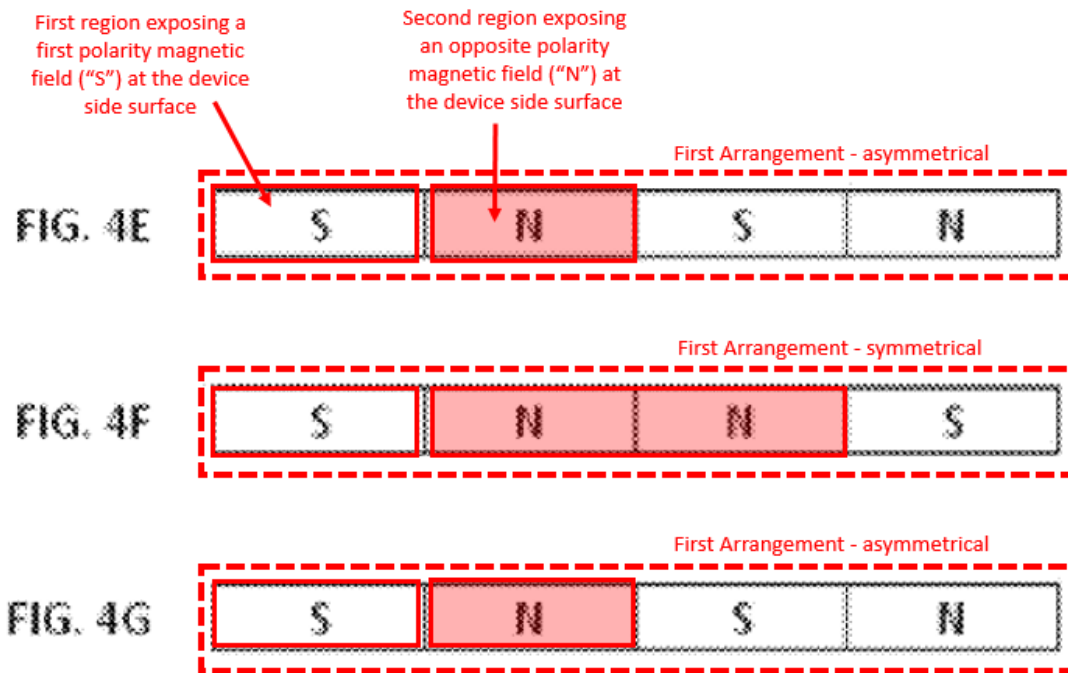
c. [1.B]

Berkley-Baca renders obvious [1.B]. EX1003, ¶¶165-168; EX1002, 447-49. Baca (as incorporated-by-reference) provides support in the '641 patent for the claimed "magnetic arrangements." EX1003, ¶¶84-92. Figure 2A of Baca illustrates the positioning of several magnet arrangements on the backside of a mobile device:



EX1006, FIG. 2A (annotated).

Each “self-aligning” arrangement in Figures 2A-3D of Baca comprises magnets of opposite polarities, examples of which are shown in Figures 4A-4I. EX1006, ¶84. Each such self-aligning magnetic arrangement includes at least one region that exposes a magnetic north polarity (“N”), and at least one adjacent region that exposes a magnetic south polarity (“S”):

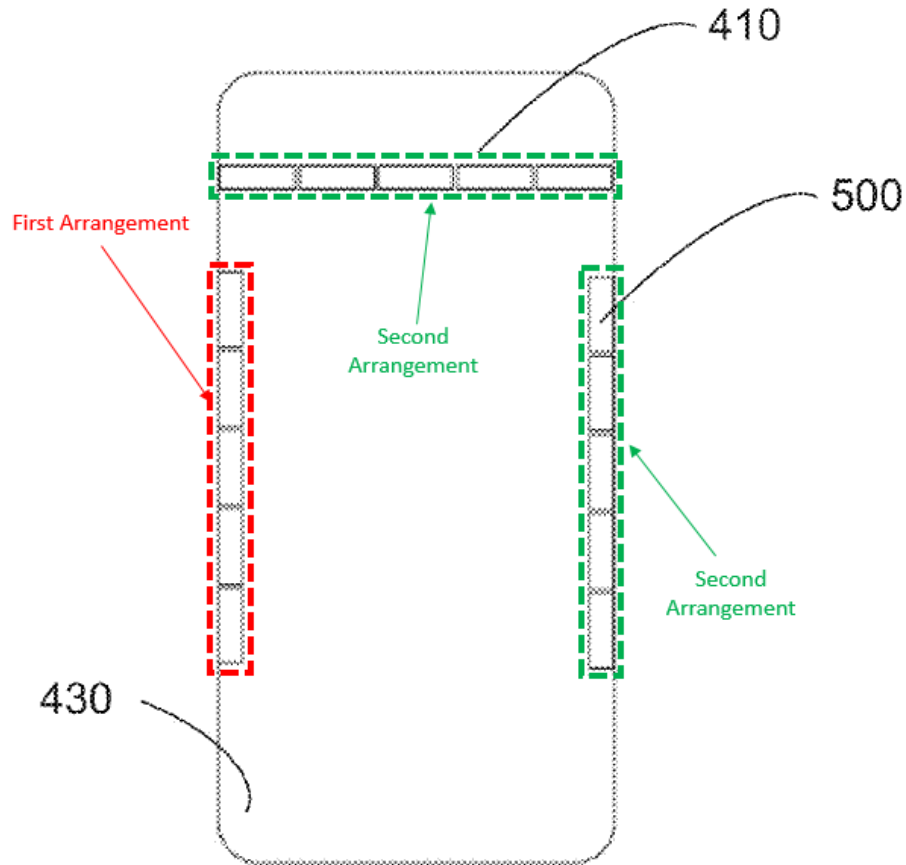


EX1006, FIGs. 4E-4G (annotated).

In Berkley-Baca, the first arrangement would be implemented on the device-side surface of Berkley's wallet 10. EX1003, ¶¶165-168.

d. [1.C]

Berkley-Baca renders obvious [1.C]. EX1003, ¶¶169-173. Several of Baca's arrangements are disposed on the back side of an electronic device (below). Each magnetic arrangement is "self-aligning" and comprises magnets of opposite polarities. *See* [1.B]. A POSA would have understood that, for each magnetic arrangement, a corresponding magnetic arrangement would be disposed on the bottom surface 25 of Berkley's wallet, e.g., as shown in Figures 4A-4I of Baca. Thus, like the first arrangement, each of the second arrangements shown below satisfies the claimed "second arrangement." EX1003, ¶¶170-171.



EX1006, FIG. 2A (annotated).

Should 1LSS argue Baca teaches only “a single array of magnetic elements,” the Board has previously rejected this argument, finding that, at a minimum, it would have been obvious to duplicate Baca’s surface-side attachments to arrive at the claimed first and second arrangements, particularly because there is no evidence the claimed arrangement yields unexpected results. *See* EX1002, 446, 448. Moreover, the ’641 patent relies on exactly the magnetic elements disclosed by Baca without providing additional disclosure regarding the arrangements. EX1003, ¶¶84-92. Thus, a POSA would have duplicated Baca’s surface-side

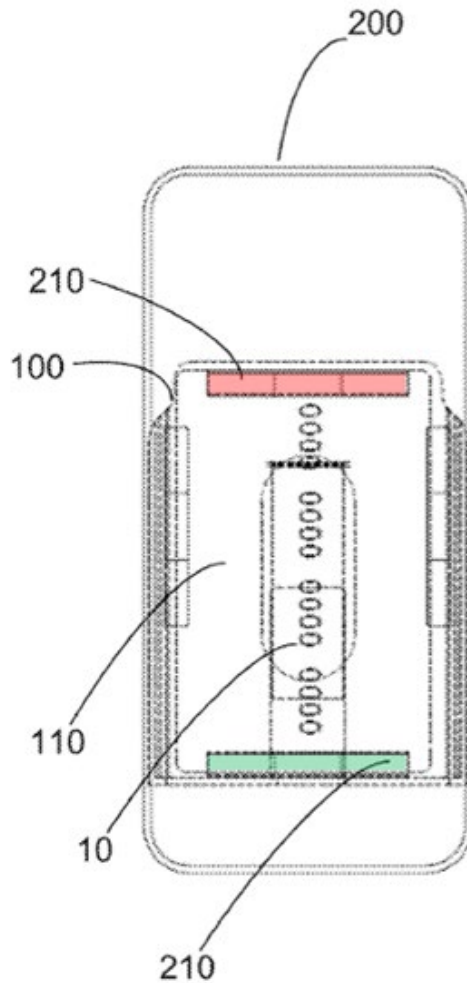
attachments to strengthen the attachment between the wallet and mobile device so that the wallet does not detach and become lost. EX1003, ¶¶172-173.

e. [1.D]

Berkley-Baca-Goto renders obvious [1.D]. EX1003, ¶¶174-181. Goto discloses embedding a magnetic-shielding plate made of thin iron foil as a layer that sits beneath materials used for wallets, such as leather and plastic. EX1012, 11:48-55, 12:9-19. A POSA would have included Goto’s magnetic-shielding on or embedded as a layer within the bottom surface of Berkley’s base 28—between Berkley’s compartment that holds cards and Baca’s magnets—to prevent potential magnetic damage caused by Baca’s magnets EX1003, ¶175. Iron is “ferromagnetic,” and thus Goto’s magnetic-shield plate made of iron is a “ferromagnetic shield.” EX1003, ¶¶176-180 (including FIG. A showing cross-section); EX1033, 255.

f. [1.E.1]

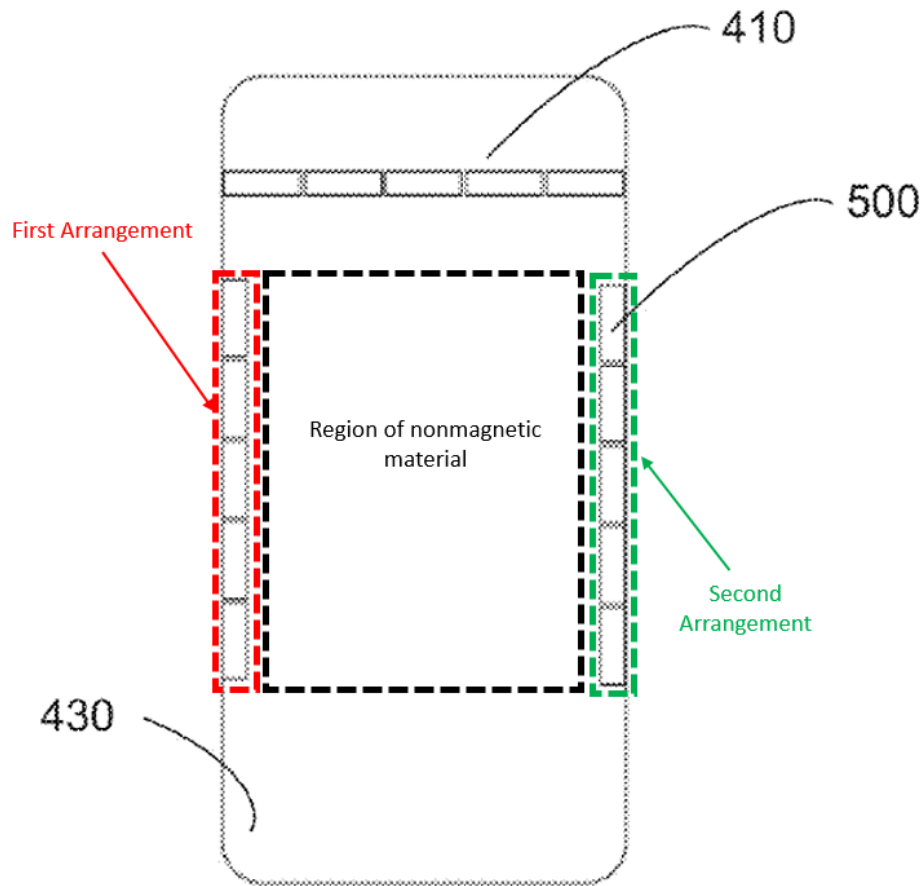
Berkley-Baca renders obvious [1.E.1]. EX1003, ¶¶182-188; EX1002, 447-49. The ’641 specification does not describe a “region of nonmagnetic material” or explain that it is a critical feature. On appeal, 1LSS identified only Figure 16A as alleged support for this limitation. EX1002, 327. Figure 16A shows two magnetic arrangements separated by a portion of the surface of wallet 100.



EX1001, FIG. 16A (annotated).

But Figure 16A and its related description neither disclose such separation as constituting any “region of nonmagnetic material” nor provide any reason why such a region is important to the magnetic arrangements. *See* EX1001, 9:66-10:3, FIGs. 16A-16B.

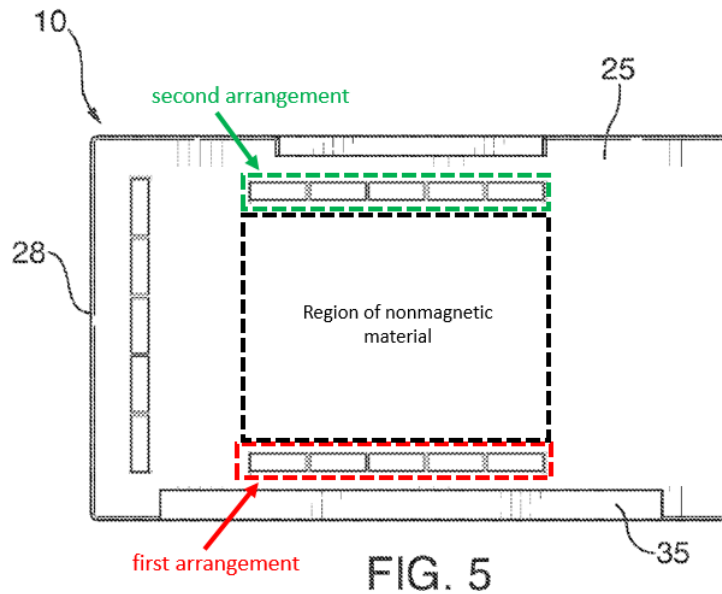
Baca’s Figure 2A shows a configuration of magnetic arrangements that are separated geographically like Figure 16A of the ’641 patent.



EX1006, FIG. 2A (annotated).

As shown below, the magnetic arrangements disposed on the bottom surface 25 of Berkley's wallet would similarly be physically separated on the wallet by a region of nonmagnetic material. A POSA would have understood or found obvious that Berkley's wallet is made of a nonmagnetic material.⁵ EX1003, ¶¶184-188.

⁵ Goto discloses wallets made of leather or plastic. EX1012, 11:48-55, 12:9-19. Because a POSA would have been motivated to use leather or plastic, as Goto teaches, Berkley-Baca-Goto also render obvious [1.E.1]. EX1003, ¶187.



EX1003, ¶186, FIG. D (annotating Berkley, FIG. 5 to show Baca's magnets).

Notably, 1LSS did not dispute, and the Board affirmed, that Berkley-Baca teaches this element. *See* EX1002, 447-49. And the lack of detail in the '641 patent demonstrates a POSA would have known how to implement this limitation. *See In re Epstein*, 32 F.3d 1559, 1568 (Fed. Cir. 1994) (“... that appellant did not provide the type of detail in his specification that he now argues is necessary in prior art references supports the Board’s finding that one skilled in the art would have known how to implement the features of the references”); *Paice LLC v. Ford Motor Co.*, 881 F.3d 894, 902 (Fed. Cir. 2014) (cannot hold prior art to higher standard that claimed invention).

g. [1.E.2]

Berkley-Baca renders obvious [1.E.2]. EX1003, ¶¶189-196; EX1002, 447-

49. Like [1.E.1], the '641 specification does not describe [1.E.2] or explain its importance, and 1LSS pointed only to Figure 16A as alleged support during the appeal. EX1002, 327. Figure 16A shows the first and opposite polarity regions abut one another, so that the claimed “distance between any two immediately adjacent first polarity and opposite polarity regions in the first or second arrangement” would be zero. [1.E.2] is thus satisfied by any two arrangements that are separated geographically. Indeed, 1LSS introduced [1.E.2] via amendment to indicate that the “first and second arrangement were *separated geographically* so as not to be part of the same grouping of magnetic material.” EX1002, 263, 266.

The magnetic arrangements on both the wallet and mobile device in Berkley-Baca shows that “the region of nonmagnetic material” has a “maximum cross dimension” that is greater than the distance between any two immediately adjacent regions of the magnetic arrangements. That is, the first and opposite polarity regions of the magnetic arrangements abut each other; whereas the first and second magnetic arrangements (shown in red and green below) are separated by a distance about the width of the mobile device. The figures below show the claimed “maximum cross dimension” on the mobile phone and on the wallet, respectively. EX1003, ¶¶193-195.

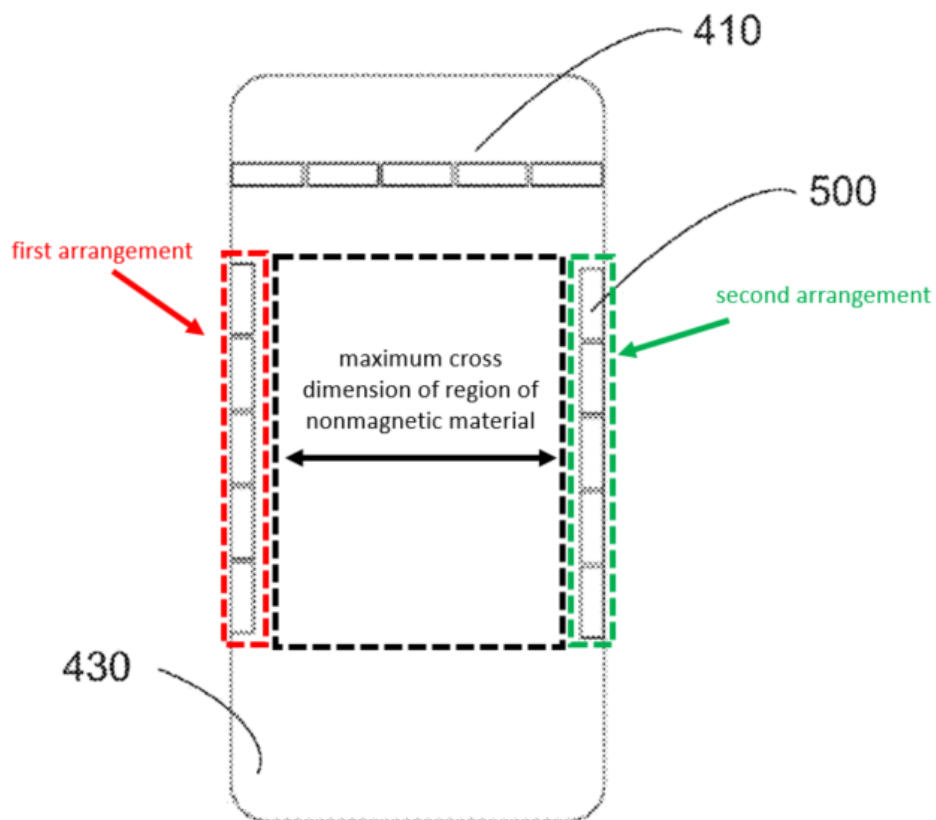
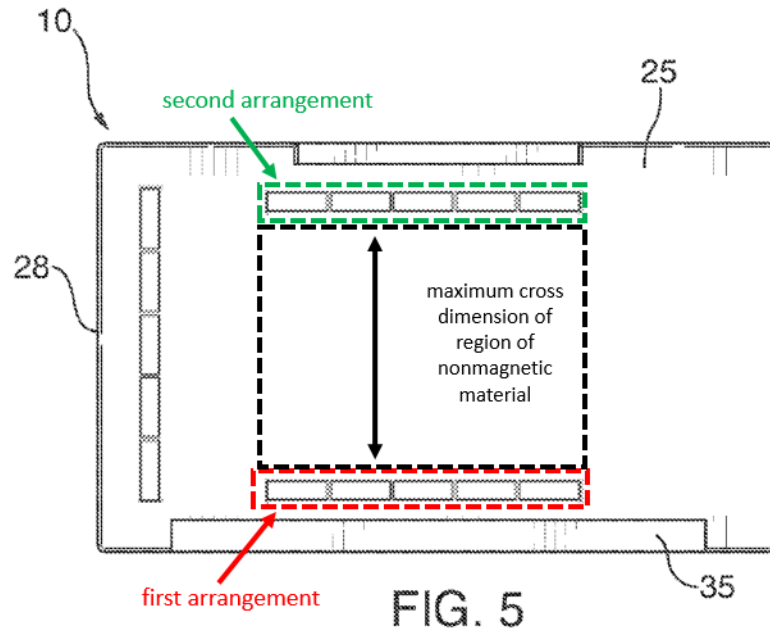


FIG. 2A

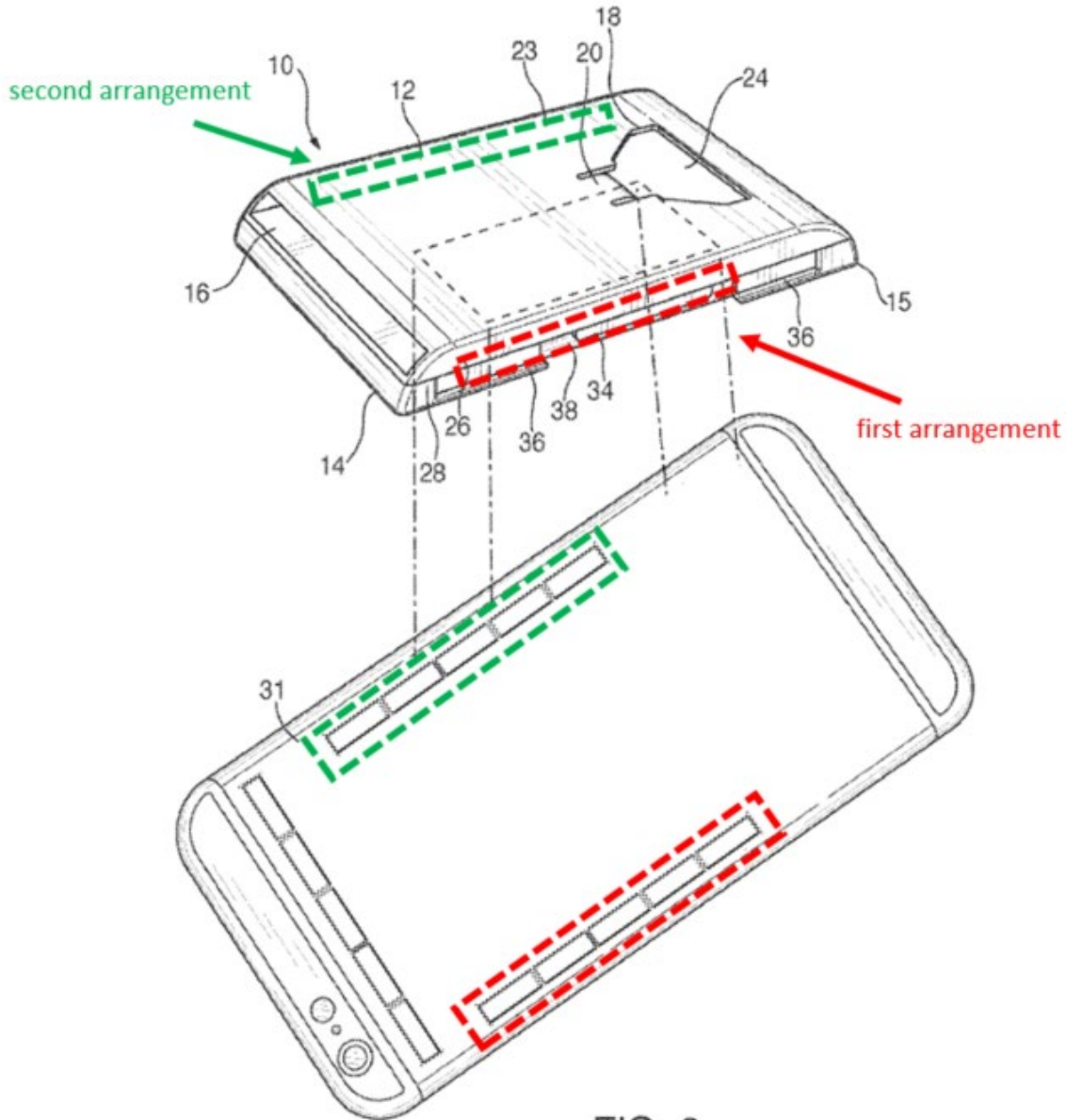
EX1006, FIG. 2A (annotated).



EX1003, ¶195, FIG. E (annotating Berkley, FIG. 5 to show cross dimension).

h. [1.F.1]

Berkley-Baca renders obvious [1.F.1]. EX1003, ¶¶197-198; EX1002, 447-49. In Berkley-Baca, the first and second arrangements of magnets on the base of Berkley's wallet would concurrently magnetically couple Berkley's wallet to the mobile device.



EX1003, ¶197, FIG. C (Berkley, FIG. 6 annotated to show Baca's magnets).

i. [1.F.2]

Berkley-Baca renders obvious [1.F.2]. EX1003, ¶¶199-203; EX1002, 447-49. In Berkley-Baca, the wallet would include the first and second arrangements on the base that would cause Berkley's wallet to adopt no more than two orientations on the handheld device (right-side up or upside-down). This understanding of "a

specific orientation” is consistent with claims 7 and 8 below, which clarify that the specific orientation can be either “exactly one orientation” or “exactly two orientations,” respectively. Sections VI.F.5-6.

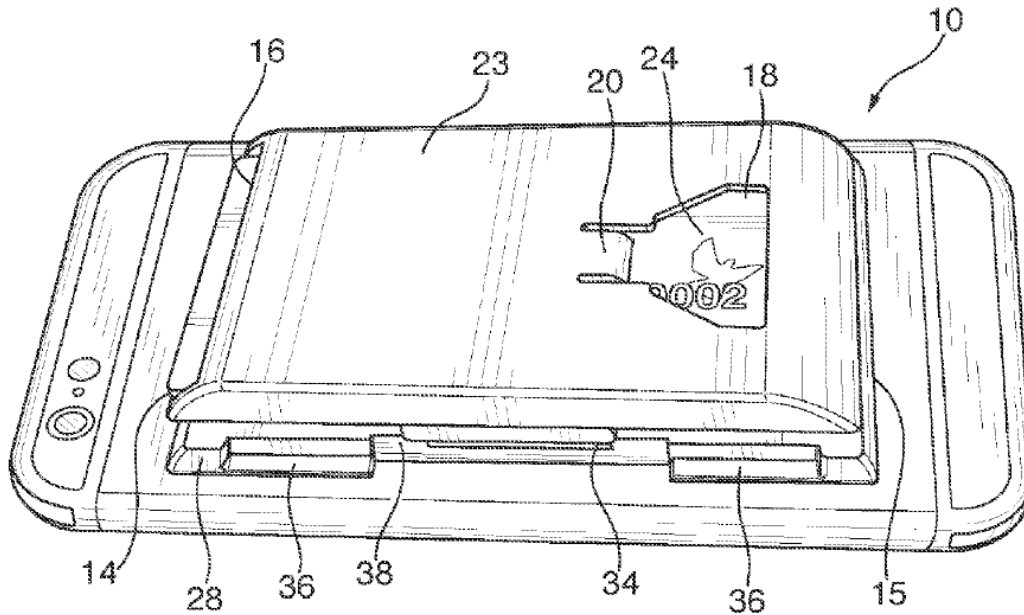
2. Claim 5

Berkley-Baca-Goto renders claim 5 obvious. Regarding [5.P]-[5.C] and [5.E.1]-[5.F.2], see [1.P]-[1.C] and [1.E.1]-[1.F.2] above. Sections V, VI.E.1. [5.D] recites “a metallic plate between the first arrangement and the compartment.” Goto’s magnetic-shielding plates are made of iron foil, and a POSA would have known that iron is a metal. EX1003, ¶¶204-205.

F. Claims 2-4, 6-8

1. Claim 2

Berkley discloses claim 2. EX1003, ¶¶206-208; EX1002, 447-49. Berkley discloses that first casing 12 includes a window 18 that exposes the contents of the compartment. EX1013, FIG. 2. Like the “content removal slot” described by the ’641 patent, Berkley’s window 18 “is sized and adapted to accommodate a finger of a user,” so that the user “may selectively guide and push card C1 from the first casing 12 by gently directing a card forward through and out of receiving slot 16.” *Compare* EX1013, ¶22, *with* EX1001, 8:58-64.



EX1013, FIG. 2.

Berkley's window 18 meets the claimed "content removal slot." EX1003, ¶¶206-208; EX1002, 447-49.

2. Claim 3

Berkley-Baca renders obvious claim 3. EX1003, ¶¶209-210; EX1002, 447-49. Baca discloses using magnetic materials "selected based on their strongly magnetic properties." EX1006, ¶80; *see* EX1006, ¶87 ("...supports the weight of a mounted electronic display device 400 and resists the force of gravity upon the mounted electronic display device 400."). It would have been obvious to use magnetic materials having attractive force sufficient to support the weight of a mobile device to prevent unintentional detachment from the wallet. EX1003, ¶¶209-210.

3. Claim 4

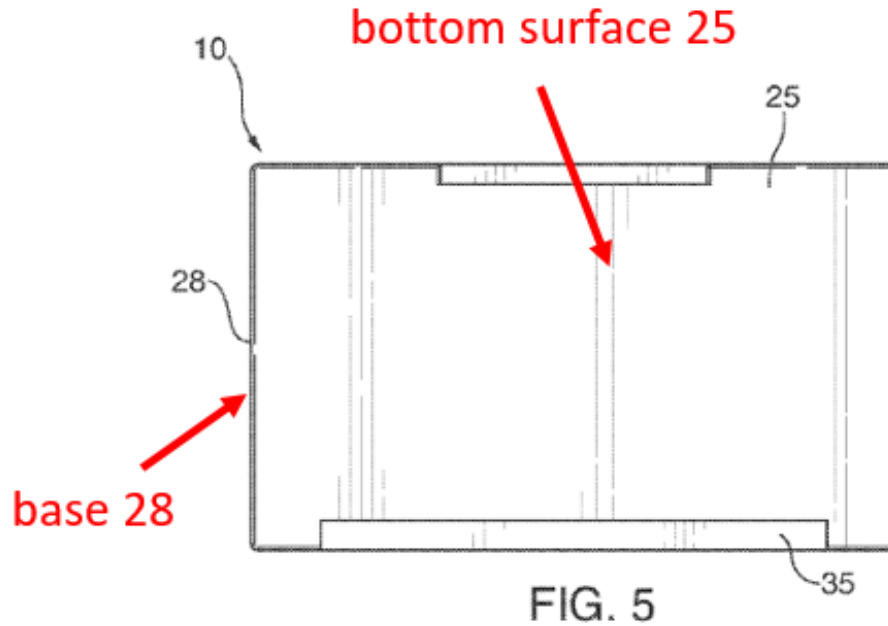
Berkley-Baca renders obvious. EX1003, ¶¶211-216. To the extent the '641 patent supports this claim, such support is found in the materials incorporated from Baca. EX1003, ¶¶84-92. For support on appeal, 1LSS identified Figure 4 of the '641 patent, which merely shows magnetic arrangements 119, 129 with magnets that abut each other, just like in Figures 4A-4L from Baca. *Id.*; EX1002, 328. Accordingly, any support for this element in the '641 patent is also found in Baca. 1LSS cannot now require a level of detail in the prior art that is not provided in its own specification. *Epstein*, 32 F.3d at 1568; *Paice*, 881 F.3d at 902.

The Board also determined that this claim element was obvious over Berkley-Baca. EX1002, 449. Initially, the Examiner found that the magnets that “appear to contact each other” or are separated by “some minimal distance” make this claim element “obvious as a mere selection of an art appropriate distance or at most a mere change in size/proportion,” “or a mere rearrangement of parts,” and 1LSS never challenged this finding. EX1002, 274-75. Applying this rationale, the Board found this claim element obvious. EX1002, 449. Such findings are consistent with the Federal Circuit’s holding that a POSA may make inferences and relative comparisons from drawings. *Paice LLC v. Ford Motor Co.*, 722 F. App’x 1015, 1021-23 (Fed. Cir. 2018) (unlabeled coordinate axis was sufficient to allow inferences and relative comparisons by a POSA).

4. Claim 6

Berkley discloses claim 6. EX1003, ¶¶217-222; EX1002, 449. During prosecution, 1LSS explained that “planar” is “to distinguish from arcuate surfaces having a significant radius of curvature and surfaces that have protrusive attachment features.” EX1002, 195.

Berkley’s wallet includes base 28 including a “bottom surface 25.” EX1013, ¶26. Berkley’s Figure 5 shows a bottom plan view of bottom surface 25 that is, other than the presence of cutouts 36, substantially planar (not arcuate). EX1013, ¶¶17, 28, 35. A POSA would have understood that the surfaces of Berkley’s wallet and mobile device would be substantially planar to facilitate attachment of the magnetic arrangements and attachment of the wallet to the mobile device. EX1003, ¶¶220-221.



EX1013, FIG. 5 (annotated).

The Examiner found that Berkley disclosed this claim element. EX1002, 157, 207, which 1LSS did not dispute, EX1002, 196-99, 241-45, 335 (arguing only that Levy teaches away from this claim element). The Board affirmed based on Berkley-Baca. EX1002, 449.

5. Claim 7

Berkley-Baca renders obvious claim 7. EX1003, ¶¶223-225. Baca discloses that each magnetic arrangement comprises either a symmetric or asymmetric configuration of magnets. EX1006, ¶84, FIGs. 4A-4I. In duplicating one of Baca's asymmetric arrangements (e.g., Figures 4E or 4G), the two magnetic arrangements together would have at most one degree of rotational symmetry about an axis extending out of the page. EX1006, ¶84 ("...can be mounted in only one

position.”). Using any of Baca’s asymmetric magnetic arrangements in Baca’s Figure 2A would result in a set of magnetic arrangements that “permit coupling to the mobile device in exactly one orientation,” as claimed. EX1003, ¶224. The Examiner and the Board made the same finding. EX1002, 283, 451. The Board found this element “is explicitly disclosed in paragraph 84 of Baca.” EX1002, 451.

6. Claim 8

Berkley-Baca renders obvious claim 8. EX1003, ¶¶226-228. Baca discloses that each magnetic arrangement comprises either a symmetric or asymmetric configuration of magnets. EX1006, ¶84, FIGs. 4A-4I. In duplicating one of Baca’s symmetric arrangements (e.g., Figure 4F), the two magnetic arrangements together would have at most two degrees of rotational symmetry about an axis extending out of the page. EX1006, ¶84 (“...mounted in either of two positions...”). Using one of Baca’s symmetric magnetic arrangements in Baca’s Figure 2A would result in a set of magnetic arrangements that “permit coupling to the mobile device in exactly two orientations,” as claimed. The Examiner reached a similar conclusion, and the Board affirmed the Examiner’s reasoning. EX1002, 284, 452.

VII. 1B: BERKLEY-BACA-GOTO-COX RENDERS OBVIOUS CLAIM 3

Cox discloses a protective case for a mobile device that magnetically couples accessories to the case. EX1017, Abstract, ¶¶1, 51; EX1003, ¶¶133-134. Cox’s magnets “may vary in size, position, and strength” so long as they “produce

enough attractive force between the article 340 and case 300 such that the two components do not unintentionally or undesirably separate.” EX1017, ¶52.

It was obvious to apply Cox’s teachings to the Berkley-Baca-Goto wallet such that the magnetic arrangements “are sufficient to support a weight of the mobile device,” as claimed. A POSA would have been motivated based on Cox’s express teaching to prevent “unintentional[] or undesirab[e] separat[ion] after attachment” in the event of “dropping of the components, jostling of the components in a pocket, backpack, or other container, or even through normal use of the components.” EX1017, ¶52. A POSA would have understood that different magnetic materials have different attractive forces, and would have reasonably expected success in applying Cox’s teachings to select appropriate magnets to achieve the predictable result of preventing unintentional separation for the Berkley-Baca-Goto wallet. EX1003, ¶¶229-233.

VIII. 1C: BERKLEY-BACA RENDERS OBVIOUS CLAIM 11.

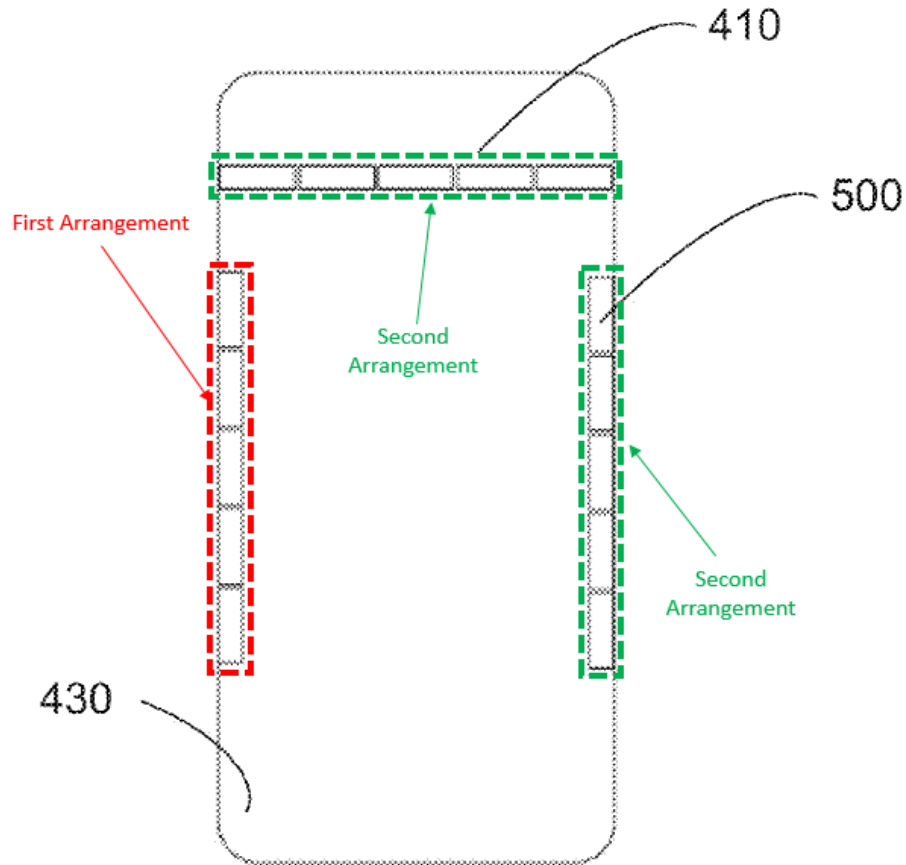
Berkley-Baca renders claim 11 obvious. Regarding [11.P]-[11.C], see [1.P]-[1.C] above; regarding [11.E.1]-[11.E.2], see [1.F.1]-[1.F.2] above. Sections V, VI.E.1.

Berkley-Baca renders obvious [11.D]. EX1003, ¶¶234-242. It was obvious to modify Berkley’s wallet to include at least two of Baca’s magnetic arrangements as the magnetic attachment mechanism. *See* [1.c] above. In fact, the only support in

the '641 patent for [11.D] is disclosure from Baca.

The Board found this was an obvious duplication of Baca's arrangements, at least because the '641 patent fails to provide any evidence of new or unexpected results from the use of two such magnetic arrangements. EX1002, 448. The Board overturned the rejection of this claim (prosecution claim 12) only because "the Examiner fail[ed] to provide any reasoning as to how or why" a POSA would have modified Berkley-Baca "with the teachings of Levy to meet" this element. EX1002, 459.

The Examiner's reliance on Levy to reject this claim was a material error. Figure 2A of Baca clearly shows a second arrangement (e.g., horizontal) having an orientation that is different from the first arrangement (e.g., vertical), which would have been disposed on Berkley's wallet. EX1003, ¶¶238-241.



EX1006, FIG. 2 (annotated).

Moreover, a POSA would have known that the duplication of Baca's magnetic arrangements is not limited to exactly duplicating one specific arrangement of magnets. Baca provides ten examples of self-aligning magnetic arrangements, any of which could be used as surface-side attachments 110. EX1006, ¶84, FIG. 4A-4I. To the extent Baca provides a reason to choose between these arrangements, such discussion is limited to “symmetrical” and “asymmetrical” arrangements that allow for mounting in different numbers of positions (one position or two positions). Thus, choosing “the first magnetic arrangement” to have “at least one of a different orientation or a different

geometric pattern than the second arrangement” amounts to no more than simply choosing two different items from the list provided by Baca. The Board found that simply choosing one item from a list and using it twice was obvious. EX1002, 448. Choosing two different items from the same list is no less obvious. EX1003, ¶241.

**IX. 1D: BERKLEY-BACA-GOTO-HAYMOND RENDERS OBVIOUS
CLAIM 9**

Haymond discloses forming a finger tether strap in a pocket device to tether a cellular phone to a user. EX1015, Abstract, 1:17-22; EX1003, ¶¶138-139, 243-251. Haymond’s pocket device 10 attaches to a cellular phone and includes a pouch 18 that is sized to hold a card (e.g., a credit or ID card). EX1015, 1:64-2:22. A finger tether strap is provided in a front surface of pocket device 10 by forming slots 36 and 38 in the outer panel 28, as shown in Figure 1 below. EX1015, 4:8-11.

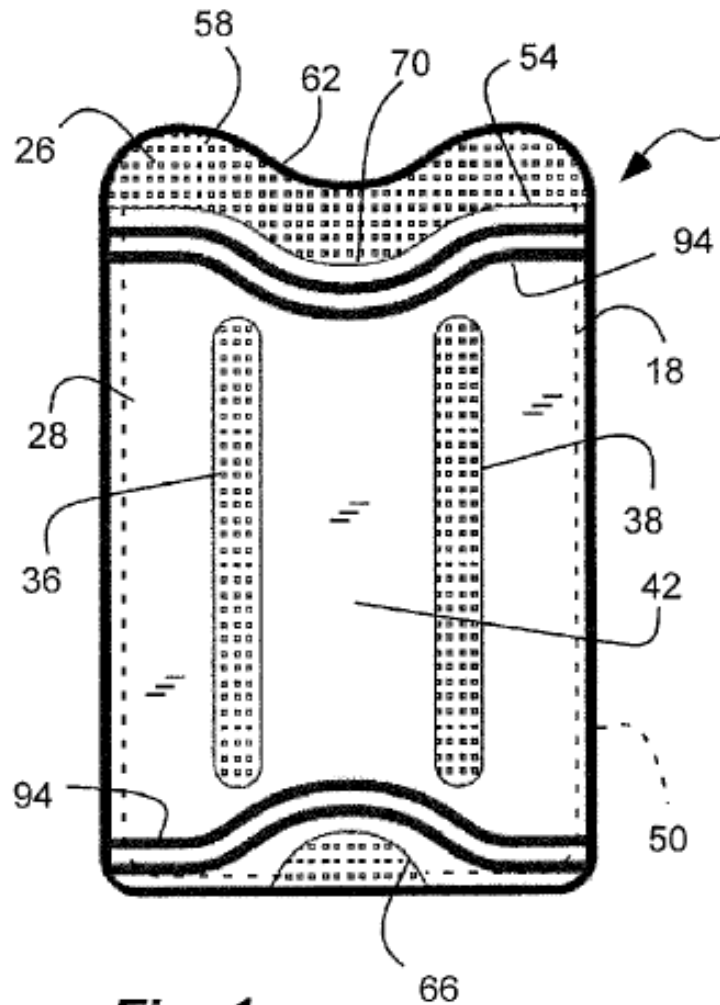


Fig. 1

EX1015, FIG. 1.

Berkley describes one problem with using a wallet-handheld device combination, noting that “the combined thickness or height of these devices ... often render the combined unit extremely difficult to ... handle manually.”

EX1013, ¶4. While Berkley suggests addressing this problem by providing a wallet that “add[s] minimal bulk to the thickness of a handheld device to which it is attached,” EX1013, ¶25, a POSA would have recognized various methods of

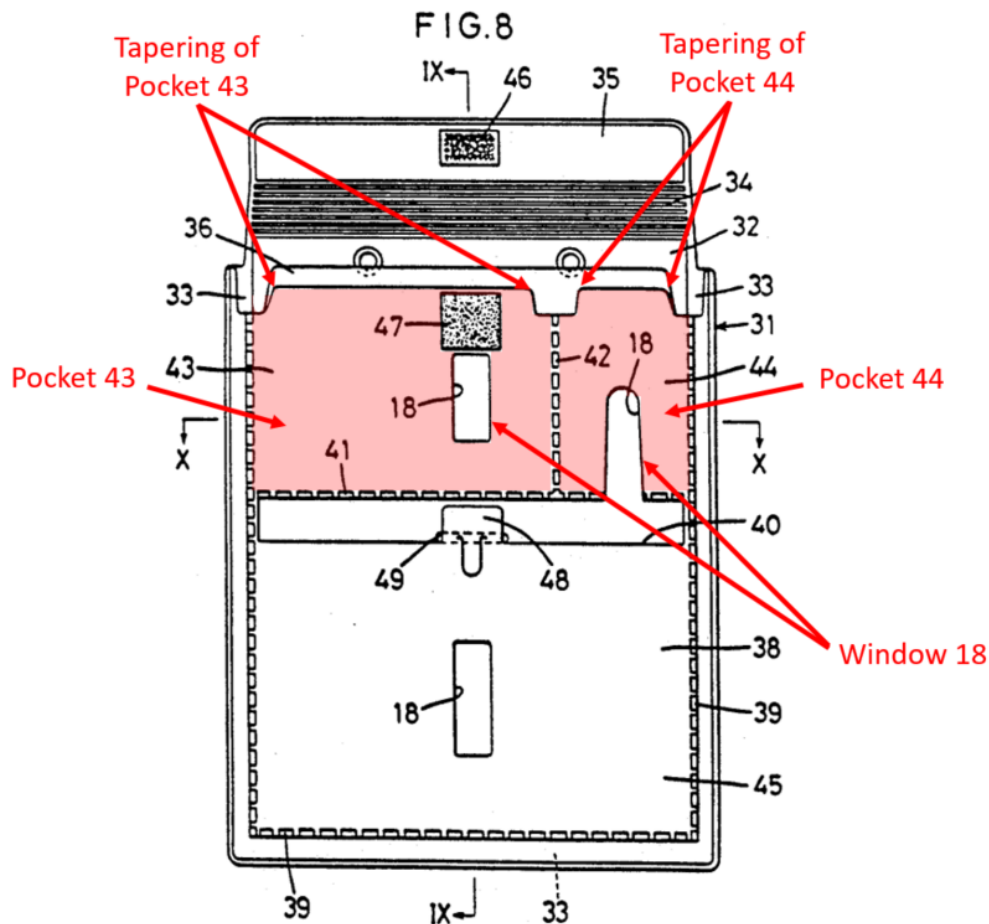
improving the usability of thick handheld devices. EX1003, ¶¶244-246. Haymond describes a well-known technique for tethering the phone to the user's hand.

A POSA would have been motivated to modify the wallet of Berkley-Baca-Goto using Haymond to include a finger strap for tethering the wallet (and thus the smartphone) to the user's hand. EX1015, 1:18-22. Such a modification would result in adding a finger strap to top surface 23 of Berkley's wallet. A POSA would have known that such a modification could be made in many ways (e.g., modifying window 18 to include a finger strap, adding a new pair of slots to top surface 23, affixing Haymond's pocket device 10 to the top surface 23, replacing first casing 12 with Haymond's pocket device 10, etc.). This would result in a wallet for a handheld device that includes a finger strap for tethering the wallet (and the handheld device) to the user. EX1003, ¶¶246-249.

A POSA also would have had a reasonable expectation of success in modifying the wallet of Berkley-Baca-Goto to include Haymond. Haymond provides a simple technique for forming a finger strap in the surface of a wallet, with the predictable result of a wallet that tethers a handheld device to a user's hand. Such a modification amounts to using Haymond's known technique to improve a similar device ready for improvement. The modification also combines known prior art elements to achieve the predictable result of a wallet for a handheld device that includes a finger strap. EX1003, ¶¶250-251.

**X. 1E: BERKLEY-BACA-GOTO-MITSUYAMA RENDERS OBVIOUS
CLAIM 10**

Mitsuyama discloses a “card case” with an “elongated opening the width of which is at least sufficient to receive a finger tip so as to allow a card to be pushed through the open side.” EX1016, Title, Abstract; *see also* EX1016, 1:38-54, 2:32-36; EX1003, ¶¶140-144. Mitsuyama depicts an example design of this “card case” with pockets 44 and 43 having a window 18 in Figure 8:



EX1016, FIG. 8 (annotated).

Mitsuyama’s pockets 44 and 43 store cards and also include the same

tapered corners depicted in Figures 8A-8B of the '641 patent. EX1016, 2:32-36, 4:1-19; EX1001, FIGs. 8A-8B; EX1002, 396-98; EX1003, ¶¶252-257.

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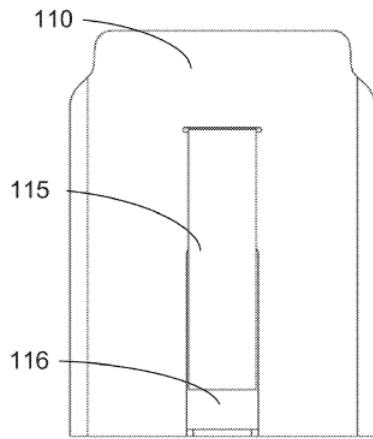


FIG. 8A

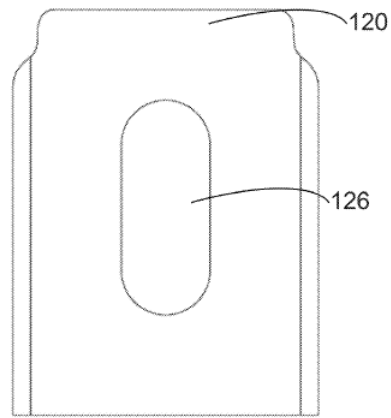
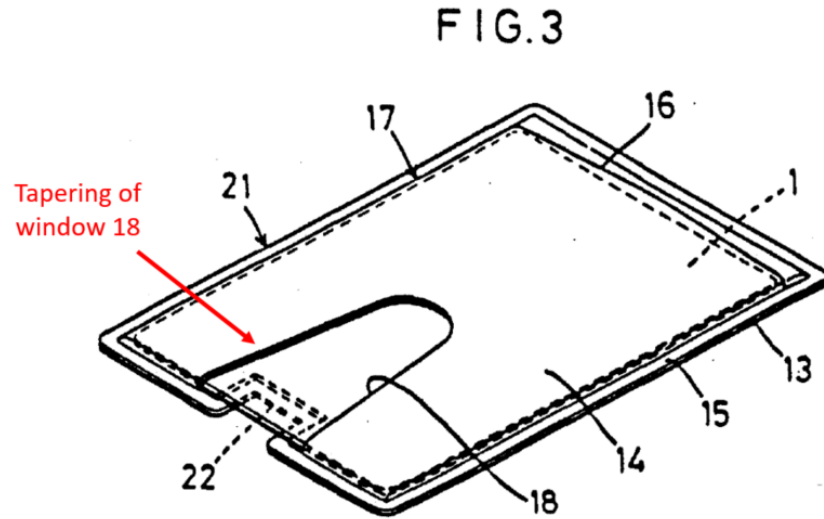


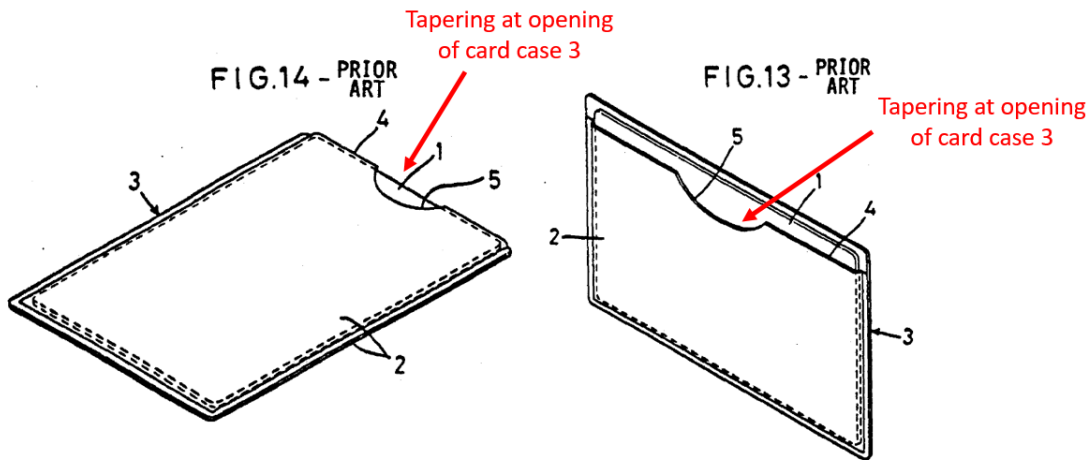
FIG. 8B

EX1001, FIGs. 8A-8B.

Alternatively, Figures 3 and 13-14 from Mitsuyama depict a semi-circle tapering. EX1016, 1:11-25, 3:10-28. The Board noted during prosecution that this shape also teaches the claimed tapering. EX1002, 456-57; EX1003, ¶¶260-263.



EX1016, FIG. 3 (annotated).



EX1016, FIGs. 13-14 (annotated).

A POSA would have been motivated to modify the compartment in the Berkley-Baca-Goto wallet to include tapering along with a finger window toward an opening. EX1016, FIG. 8, 1:26-35, 4:37-41, 4:1-19. This would improve a user's ability to remove cards from a pocket, especially when "fingers are numbered

due to cold.” EX1016, 1:31-35. Tapering would also complement Berkley’s window 18 by making it easier for a user to remove a card. EX1006, FIG. 2, ¶¶20-22; EX1003, ¶258. Mitsuyama implements both a window and tapering. EX1016, FIG. 8. Implementing Mitsuyama would have merely amounted to changing the opening 16 of Berkley’s wallet and would have predictably resulted in a wallet for a handheld device that includes the claimed tapering. EX1003, ¶258.

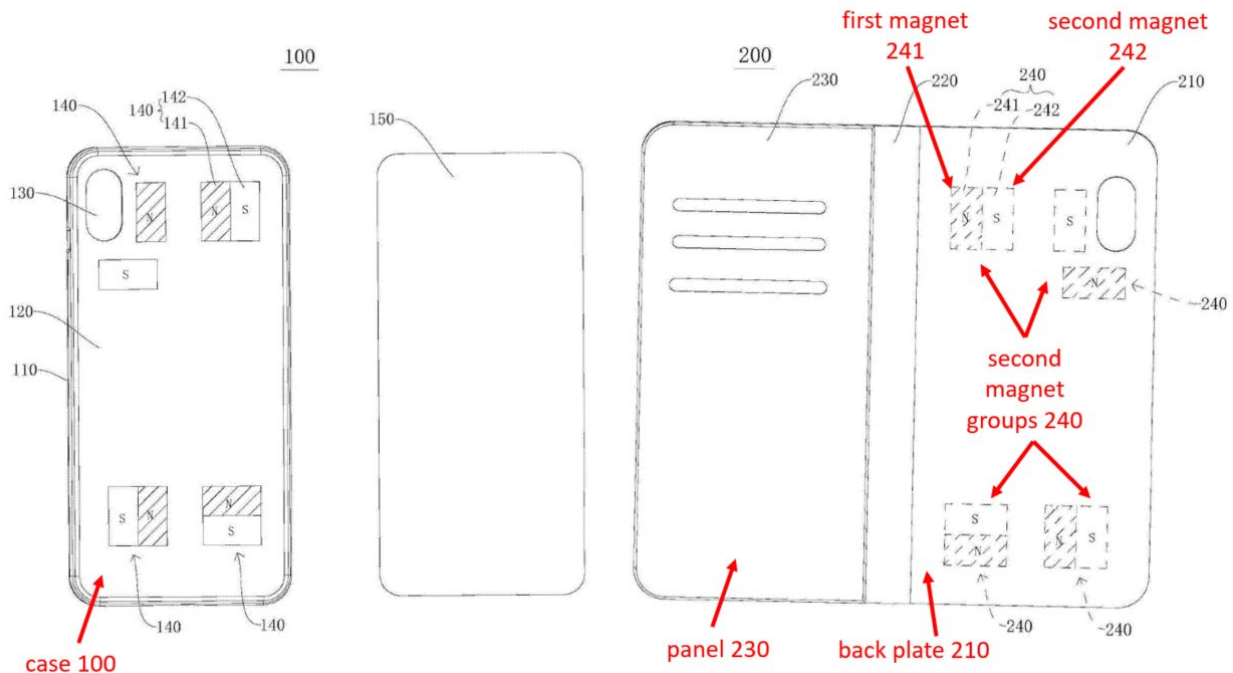
A POSA would have also had a reasonable expectation of success in combining Mitsuyama with the Berkley-Baca-Goto wallet to achieve the predictable result of a wallet with tapering. EX1003, ¶259. Both Berkley and Mitsuyama describe windows for aiding a user in retrieving a card. Section VI.F.1. Modifying Berkley to include another mechanism to aid a user would have been desirable and easy to implement and would have improved the usability of the wallet. EX1003, ¶259. Thus, implementing Mitsuyama constitutes combining known prior art elements to achieve the predictable result of a wallet that includes tapering. *Id.*

XI. 2A: ZHU-KINSHI-GOTO RENDERS OBVIOUS CLAIMS 1-7, 11

A. Zhu

Zhu discloses a mobile phone case that attaches to a folio-style cover, which

Zhu refers to as a “clip,”⁶ via magnetic arrangements. EX1008, ¶¶2, 4-8, 13; EX1003, ¶¶120-124. As shown in Figures 2 and 4 of Zhu below, clip 200 includes a back plate 210 and a panel 230. EX1008, ¶13.



EX1008, FIGs. 2 and 4 (annotated).

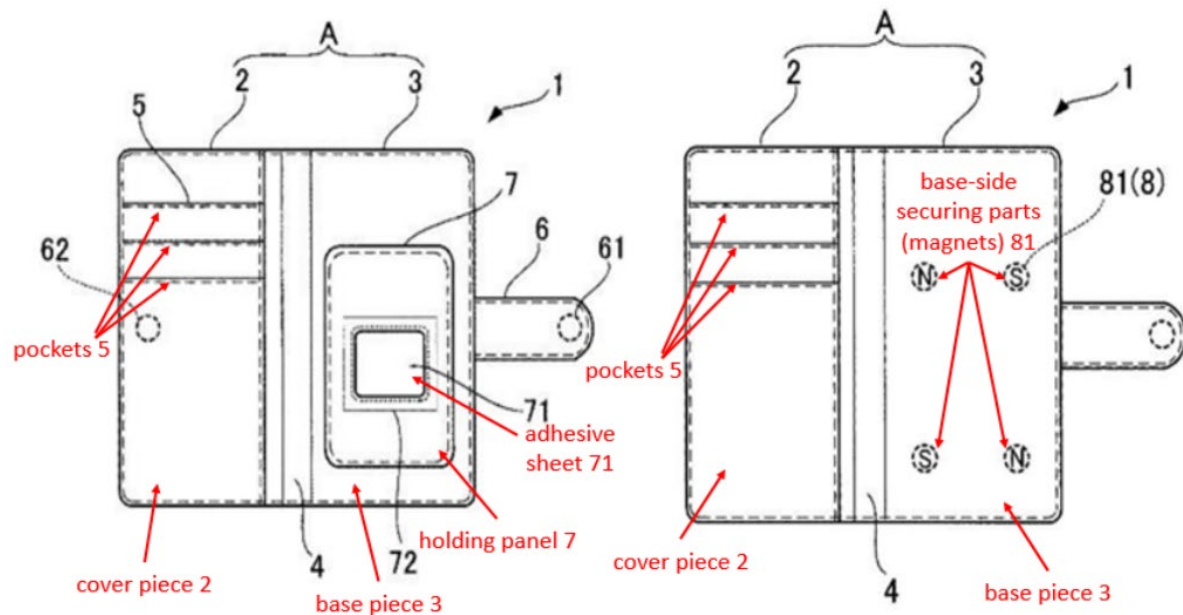
Back plate 210 includes at least four “second magnet groups” 240 that attach to corresponding magnet groups 140 in a back surface 120 of case 100. EX1008, ¶¶8, 13, 17, 30. Each second magnet group 240 is positioned at a respective corner of back plate 210 and includes a first magnet 241 (showing the “N pole”) and a first magnet 242 (showing the “S pole”). EX1008, ¶30. Each magnet group 240 is

⁶ Petitioner refers to Zhu’s clip as a cover to avoid confusion with mobile-phone belt clips.

separated from any other magnet group 240 by a region of back plate 210. Some of second magnet groups 240 are disposed with a “horizontal[]” orientation, while other are disposed with a “vertical[]” orientation. EX1008, ¶¶13, 30.

B. Kinshi

Kinshi discloses a mobile phone case formed of a base piece 3 and a cover piece 2, which includes a plurality of pockets 5 to store cards. EX1010, Abstract, ¶¶14, 15; EX1003, ¶¶125-128. A holding panel 7 attaches to the back surface of a cell phone or case via adhesive sheet 71. EX1010, ¶20. Holding panel 7 and base piece 3 each include a set of corresponding magnets (e.g., 81 in Figure 4) that allow holding panel 7 to attach to base piece 3. EX1010, ¶¶17-18.



EX1010, FIGs. 1 and 4 (annotated).

The magnets 81 in base piece 3 may comprise four magnets with polarities

that alternate in a clockwise order. EX1010, ¶26. In addition, the magnets 81 are separated by a portion of base piece 3 so that holding plate 7 is formed with a rectangular shape. EX1010, ¶¶9, 17. This configuration allows the holding panel 7 to “automatically and more accurately” attach to the base piece 3. EX1010, ¶26.

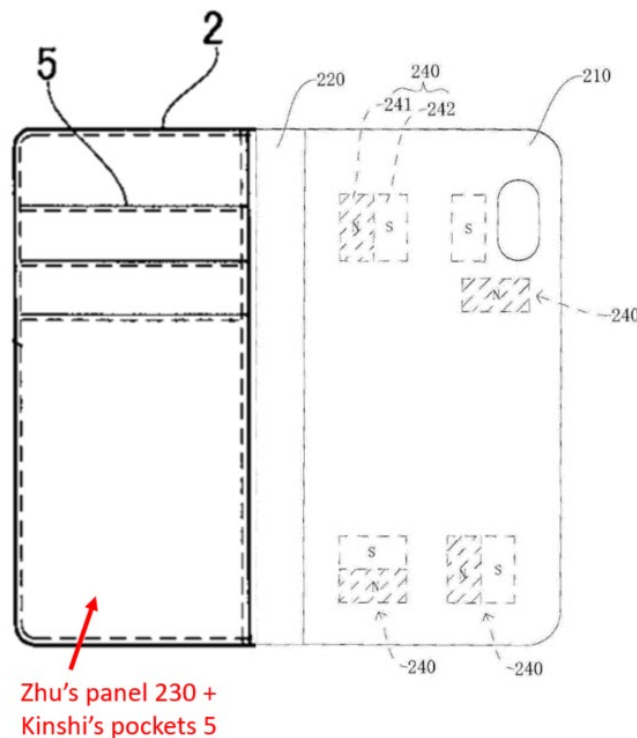
C. Motivation to Combine

Well before the '641 patent, folio-style, mobile-phone covers that were also wallets were commonplace. A POSA would have understood that such folio-style wallets combined a folio-style cover to “protect the screen of the mobile phone,” EX1008, ¶2, and “prevent damage to dropped mobile phones,” EX1010, ¶2, with the ability to store common items, such as money, credit cards, and identification cards, EX1012, ¶2. Zhu discloses a folio-style cover that (i) has a panel 230 and (ii) is attachable to a mobile device. Section XI.A. Zhu does not explicitly disclose that the cover is a “wallet,” as claimed. Kinshi discloses a folio-style wallet that stores items, such as credit cards.

A POSA would have been motivated to modify Zhu’s cover to hold items that are typically carried by a person along with a mobile phone, such as credit cards and identification cards (as disclosed by Kinshi). EX1003, ¶¶265-268. Converting Zhu’s cover into a folio-style wallet, as taught by Kinshi, would require only adding compartments to store cards (or other items). EX1003, ¶269. This modification is simply using a known technique (Kinshi’s folio-style wallet

for holding cards) to improve a similar device (Zhu's folio-style case) in the same way. *Id.*

In Zhu-Kinshi, Zhu's panel 230 would be modified simply to include one or more compartments for the predictable result of being able to store one or more items, such as credit cards and identification cards. The figure below illustrates modifying Zhu's panel 230 to include Kinshi's pockets. EX1003, ¶270.



EX1003, ¶270, FIG. F.

As modified, Zhu's cover would function as a wallet in addition to continuing to function as a protective cover for a mobile phone. Thus, the modification of Zhu's panel 230 would not change the principle of operation of Zhu's cover. EX1003, ¶271.

A POSA would have had a reasonable expectation of success of modifying

Zhu using Kinshi. This modification amounts to simply combining Kinshi's known card slots into Zhu's cover to yield the predictable result of a folio-style wallet.

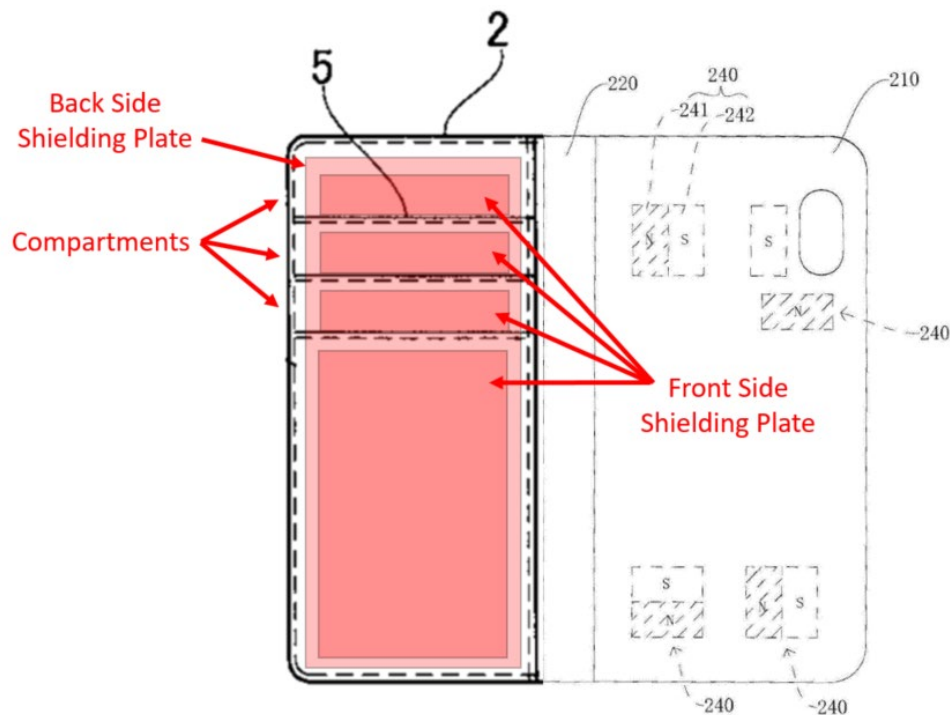
EX1003, ¶272.

A POSA would have been further motivated to modify the Zhu-Kinshi wallet to include Goto's iron-foil, magnetic-shielding plates to avoid erasing data stored magnetically on cards. EX1003, ¶¶273-279. Goto teaches such shielding is needed because the data stored on magnetic cards may be negatively affected or become unusable when exposed to a magnetic field. EX1012, 2:14-21. To avoid such damage, Goto discloses including magnetic-shielding plates made of iron foil embedded within the front and back walls of a "wallet" that holds cards. EX1012, 12:9-27.

Cards stored in the Zhu-Kinshi wallet would be susceptible to magnetic damage. First, both Zhu and Kinshi teach that mobile phone may be removed from the folio for various purposes, such as to mount the phone in a car, EX1008, ¶2, or to take a photo, EX1010, ¶4. When the mobile phone is removed and the folio is closed, the cards could be exposed to the magnets in back plate 210 of Zhu (or base piece 3 of Kinshi), exposing the cards to potential magnet damage. EX1003, ¶275. Second, even when the mobile phone is attached to the folio, it was common for a user to fold the cover back (like bending the spine of a paperback novel) when using the mobile phone while in the folio. EX1003, ¶276. Folding the cover back

in this manner would likewise expose the cards to the magnets in back plate 210 of Zhu (or base piece 3 of Kinshi). *Id.*

Accordingly, a POSA would have been motivated to modify the Zhu-Kinshi wallet to include Goto's magnetic-shielding plates in both the front and back of Zhu's panel 230 (as Goto teaches) to prevent magnetic damage when the mobile phone is removed and when the folio is folded back, respectively, as shown below EX1003, ¶¶277-278. Providing a plate on the front *or* back satisfies the claims.



EX1003, ¶277, FIG. G.

Such a modification would predictably result in the Zhu-Kinshi wallet protecting cards from magnetic damage. EX1003, ¶279. A POSA would have had a reasonable expectation of success in making this modification because it simply

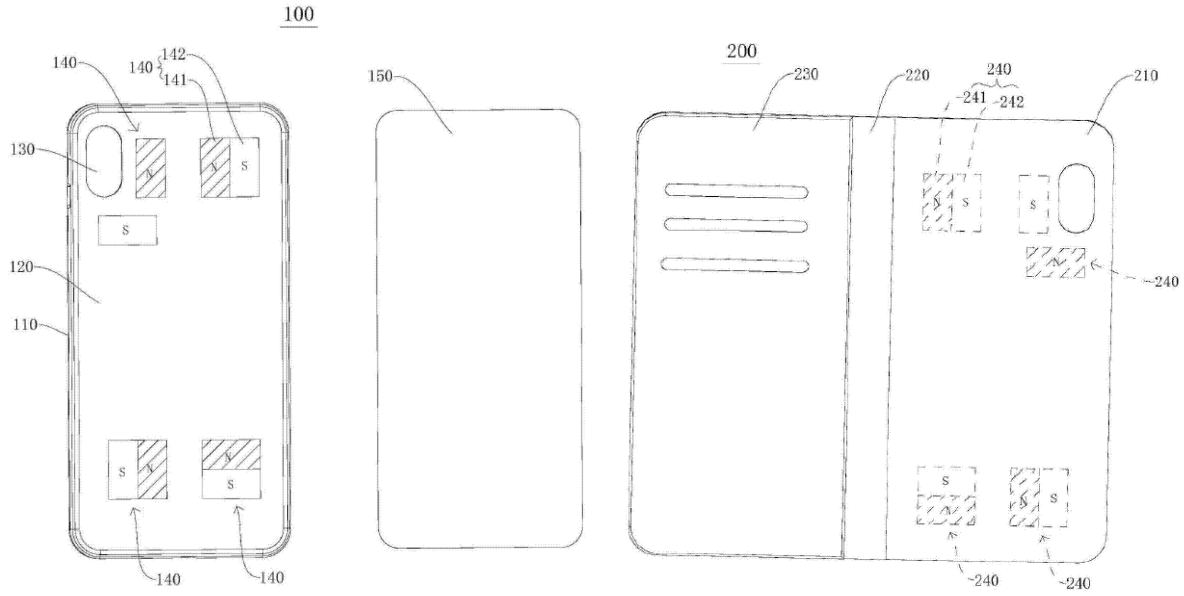
combines prior art elements (folio-style wallet and magnetic shielding) according to known methods to achieve the predictable result of protecting cards from magnetic damage. Further, the modification applies a known technique (magnetic shielding) to improve a similar folio-style wallet in the same way as Goto. *Id.*; *see also* EX1012, 12:59-65.

D. Independent Claims 1, 5, 11

1. Claim 1

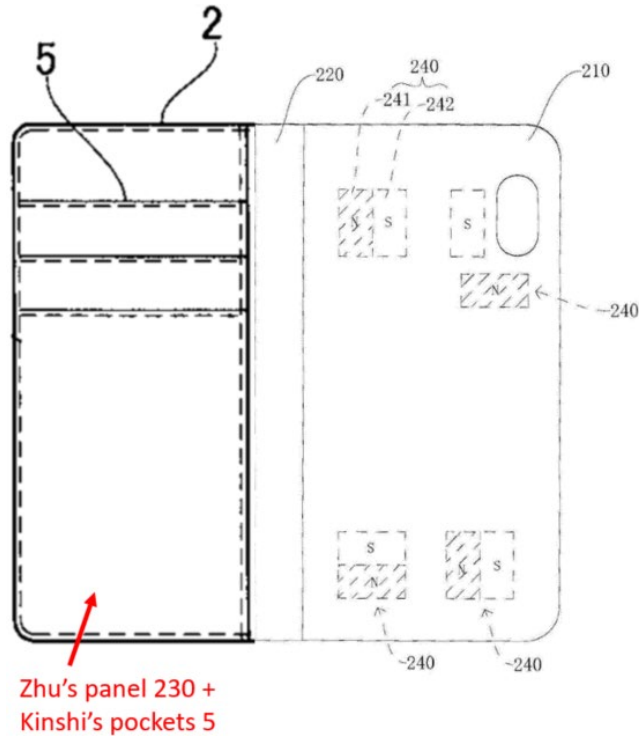
a. [1.P]

The Zhu-Kinshi combination renders obvious [1.P]. EX1003, ¶¶280-281. Again, 1LSS explicitly stated that a “mobile device” is not a structural limitation of the claims. EX1002, 195. Regardless, Zhu discloses a mobile phone case that attaches to a folio-style cover via magnetic arrangements. EX1008, ¶¶2, 4-8, 13, 30-31, FIGs. 2, 4. Zhu discloses that the cover includes at least four (second) magnet groups 240 positioned to correspond to (first) magnet groups disposed on the surface of a mobile phone case. EX1008, ¶30. The phone is inserted in the case, and the cover is attached to the case (and thus to the mobile phone) via magnetic attraction between the magnet groups. EX1008, ¶31. EX1003, ¶280.



EX1008, FIGs. 2 and 4.

A folio-style cover functioning as a wallet was well known before the '641 patent. EX1003, ¶281. Zhu, however, does not expressly disclose storing items in the cover. Kinshi discloses a folio-style wallet. The cover piece 2 of Kinshi's mobile phone case includes a "plurality of pockets 5 for storing cards." EX1010, ¶15. A POSA would have been motivated to modify Zhu's cover to include a plurality of pockets, as disclosed by Kinshi. EX1003, ¶281; Section XI.C.



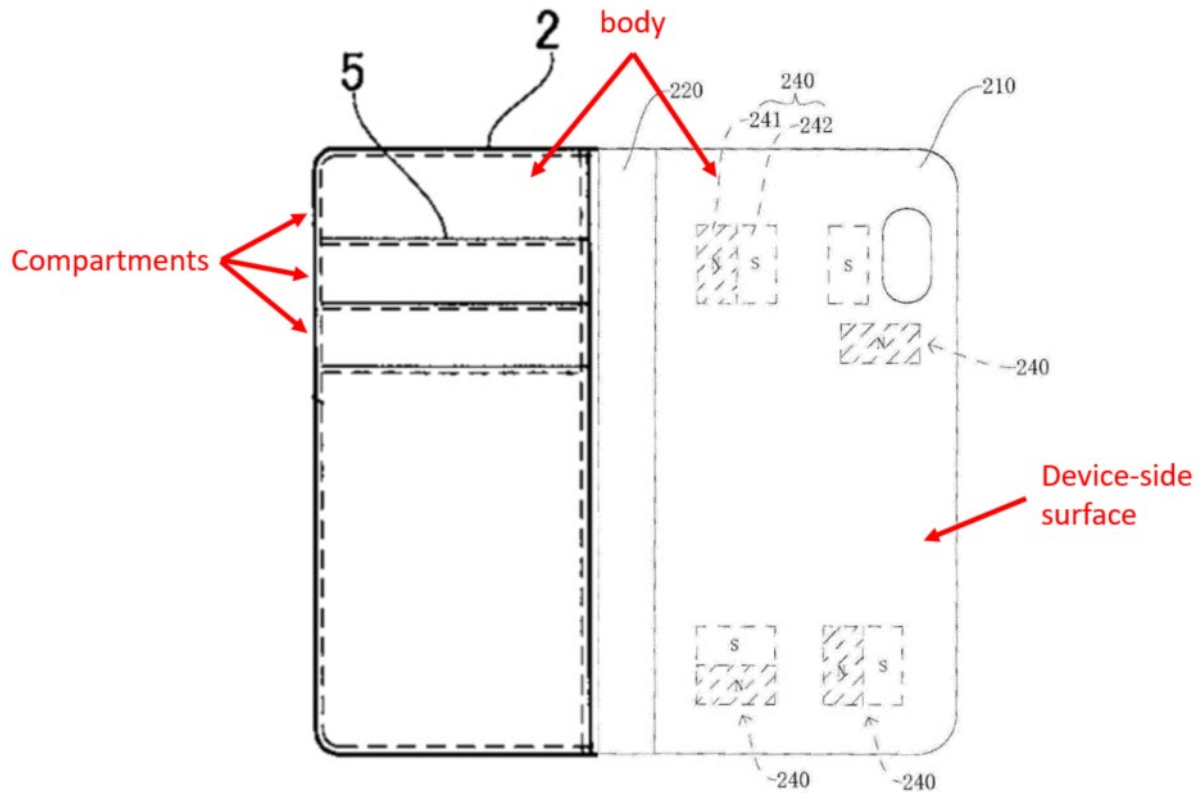
EX1003, ¶281, FIG. F.

b. [1.A]

The Zhu-Kinshi combination renders obvious [1.A]. EX1003, ¶¶282-283.

Zhu's cover includes a back plate 210 and a panel 230, EX1008, ¶30, which form a "body." Zhu's back plate 210 is configured to attach to the back surface of case 100. EX1008, ¶31. The surface of Zhu's back plate 210 that attaches to the back surface of case 100 is a "device side surface." EX1003, ¶¶282-283.

Zhu does not explicitly disclose that its body defines "a compartment." Kinshi discloses such compartments. Kinshi's mobile phone case 1 includes a "plurality of pockets 5 for storing cards." *Compare* EX1010, ¶15, with EX1001, 8:20-27. As shown below, combining Kinshi's pockets 5 with Zhu's panel 230 render obvious the claimed "compartment."

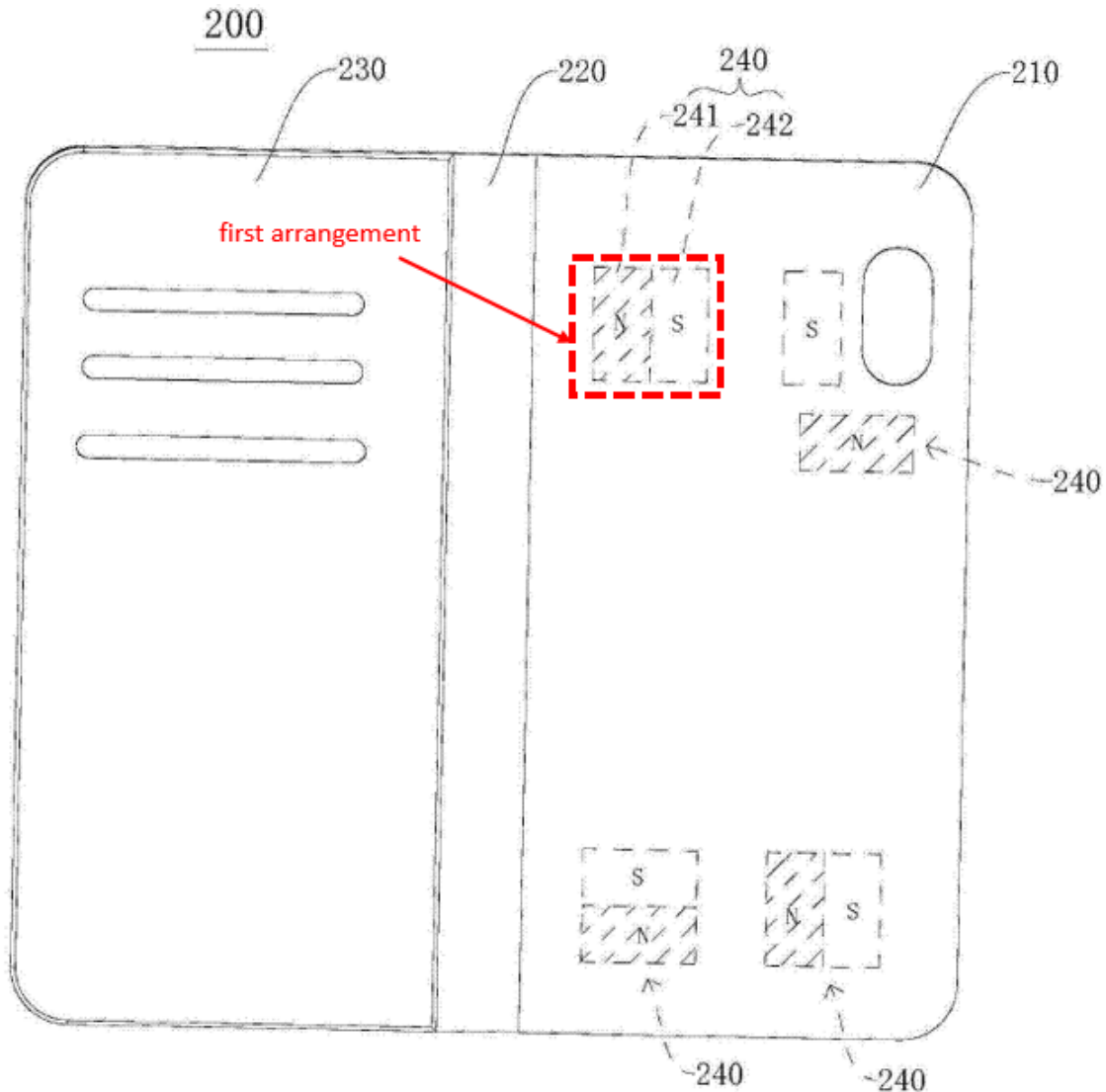


EX1003, ¶283, FIG. F.

c. [1.B]

Zhu discloses [1.B]. EX1003, ¶¶284-286. In Figure 4 below, Zhu depicts four “second magnet groups 240” positioned at corners of back plate 210. Each second magnet group 240 includes a magnet 241 disposed “with the N pole” “facing upward,” and a magnet 242 disposed with “the S pole” “facing upward.” EX1008, ¶30. Magnets 241 and 242 in a group form “a first arrangement of magnetic material.” Magnet 241 is a “first region exposing a first polarity magnetic field at the device side surface.” And magnet 242 is a “second adjacent region exposing an opposite polarity magnetic field at the device side surface.” For

example, the top-left magnet group 240 (highlighted below in red) meets the claimed “first arrangement.” EX1003, ¶¶284-286.

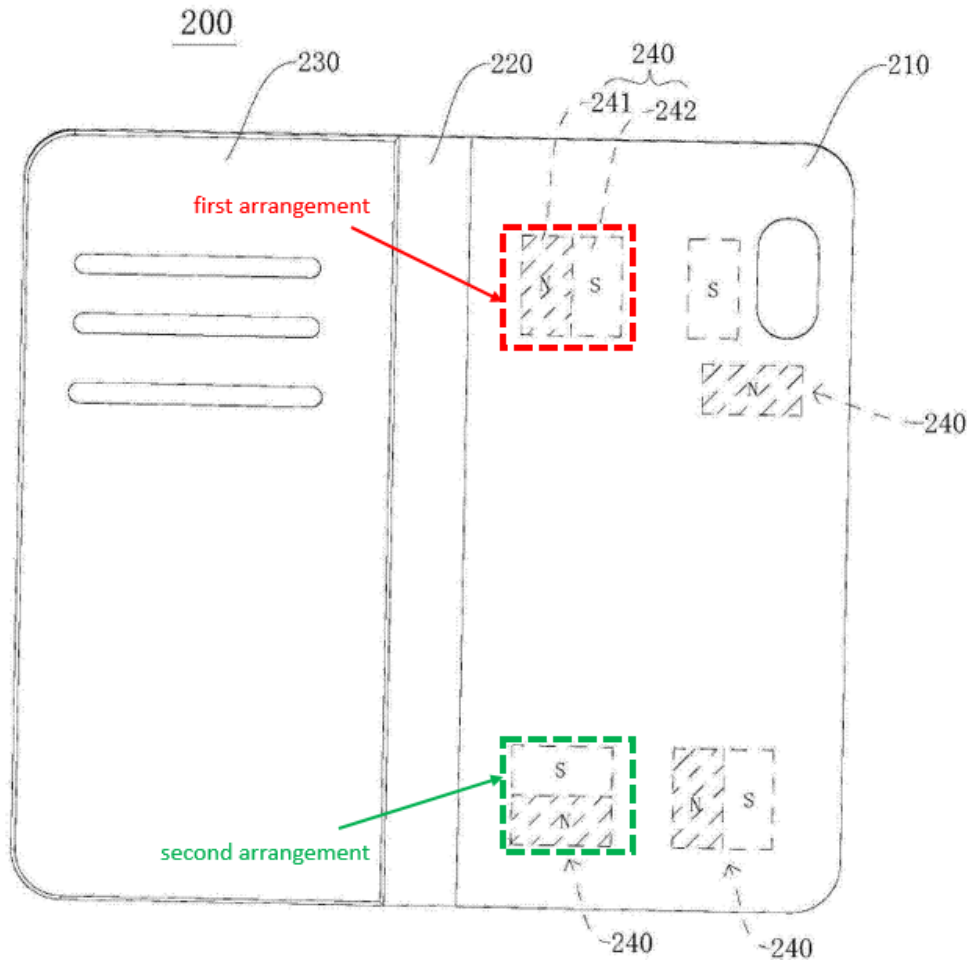


EX1008, FIG. 4 (annotated).

d. [1.C]

Zhu discloses [1.C]. EX1003, ¶¶287-288. Addressing [1.B] above, Petitioner mapped top-left magnet group 240 to the claimed “first arrangement.” Any of Zhu’s other magnet groups, such as the bottom-left group, meets the claimed

“second arrangement of magnetic material,” as shown below. EX1003, ¶287.



EX1008, FIG. 4 (annotated).

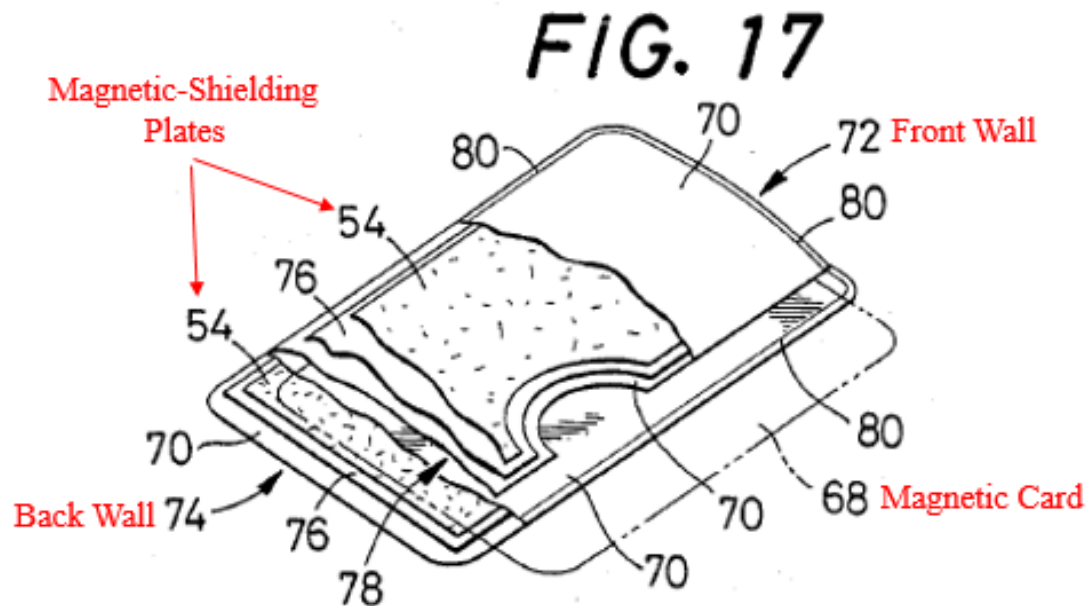
One magnet in the second arrangement (e.g., “S”) is “first region exposing a first polarity magnetic field at the device side surface.” And the other magnet in the second arrangement (e.g., “N”) is a “second adjacent region exposing an opposite polarity magnetic field at the device side surface.” EX1003, ¶288.

e. [1.D]

The Zhu-Kinshi-Goto combination renders obvious [1.D]. EX1003, ¶¶289-298. The Zhu-Kinshi wallet include first and second magnetic arrangements on

back plate 210, and compartments on panel 230. *See* [1.A]-[1.C] above. Neither Zhu nor Kinshi disclose the claimed “ferromagnetic shield.” Goto does.

In Figure 17 below, Goto discloses a magnetic-card holder that “is formed of a front wall 72 and a rear wall 74,” and inside each wall is “a magnetic shielding plate 54” that is “slightly smaller than the plane of” their respective walls. EX1012, 12:9-18. Goto discloses that the magnetic-shielding plates 54 are made of iron foil. Abstract, 3:9-40, 7:20-23, 11:53-55. A POSA would have understood that iron is a ferromagnetic material. EX1003, ¶¶290-293.



EX1012, FIG. 17 (annotated).

A POSA would have been motivated to modify the Zhu-Kinshi wallet to include Goto’s magnetic-shielding plates in both the front and back of Zhu’s panel 230 (as Goto teaches) to prevent magnetic damage when the mobile phone is

removed and when the folio is folded back, respectively. EX1003, ¶¶294-298.

Implementing Goto's plate in the front would arrange the shielding between the compartments and the magnetic arrangements when the folio is closed, whereas implementing Goto's plate in the back would arrange the shielding between the compartments and the magnetic arrangements when the folio is folded back. *Id.*

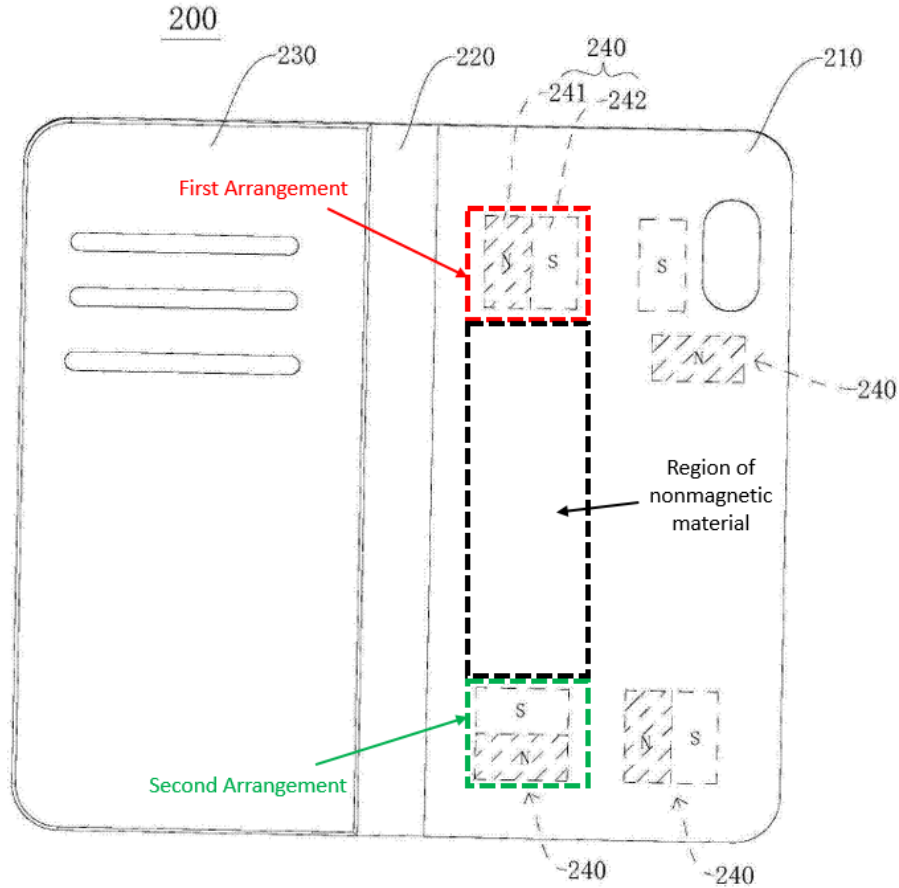
f. [1.E.1]

Zhu discloses or renders obvious [1.E.1]. EX1003, ¶¶299-304. The '641 specification does not describe a "region of nonmagnetic material," and 1LSS pointed only to Figure 16A as alleged support. Section VI.E.1.f.

Zhu discloses or renders obvious such a region. As explained for [1.B]-[1.C], Zhu discloses magnet groups that satisfy the claimed first and second arrangements. Zhu describes the mobile phone case of Figure 3 as a "rectangle," EX1008, ¶29, and the case of Figure 4 has the same rectangular shape, EX1003, ¶304. Zhu also describes the magnet groups in the case of Figure 3 as located in the corners, EX1008, ¶29, and the same is true of the case of Figure 2 and the cover of Figure 4, EX1003, ¶304. Like Figure 16A of the '641 patent, each of Zhu's second magnet groups 240 is separated from any other second magnet group 240 by a region of back plate 210. EX1008, ¶29, FIG. 4.

A POSA would have understood that the regions of back plate 210 that do not include such magnets are nonmagnetic. Otherwise, the magnets in the case

would be attached to the back plate 210 itself instead of to the second magnet groups 240.⁷ See EX1008, ¶30. Thus, Zhu discloses or renders a region of nonmagnetic material separating the first and second arrangements. EX1003, ¶¶300-304.



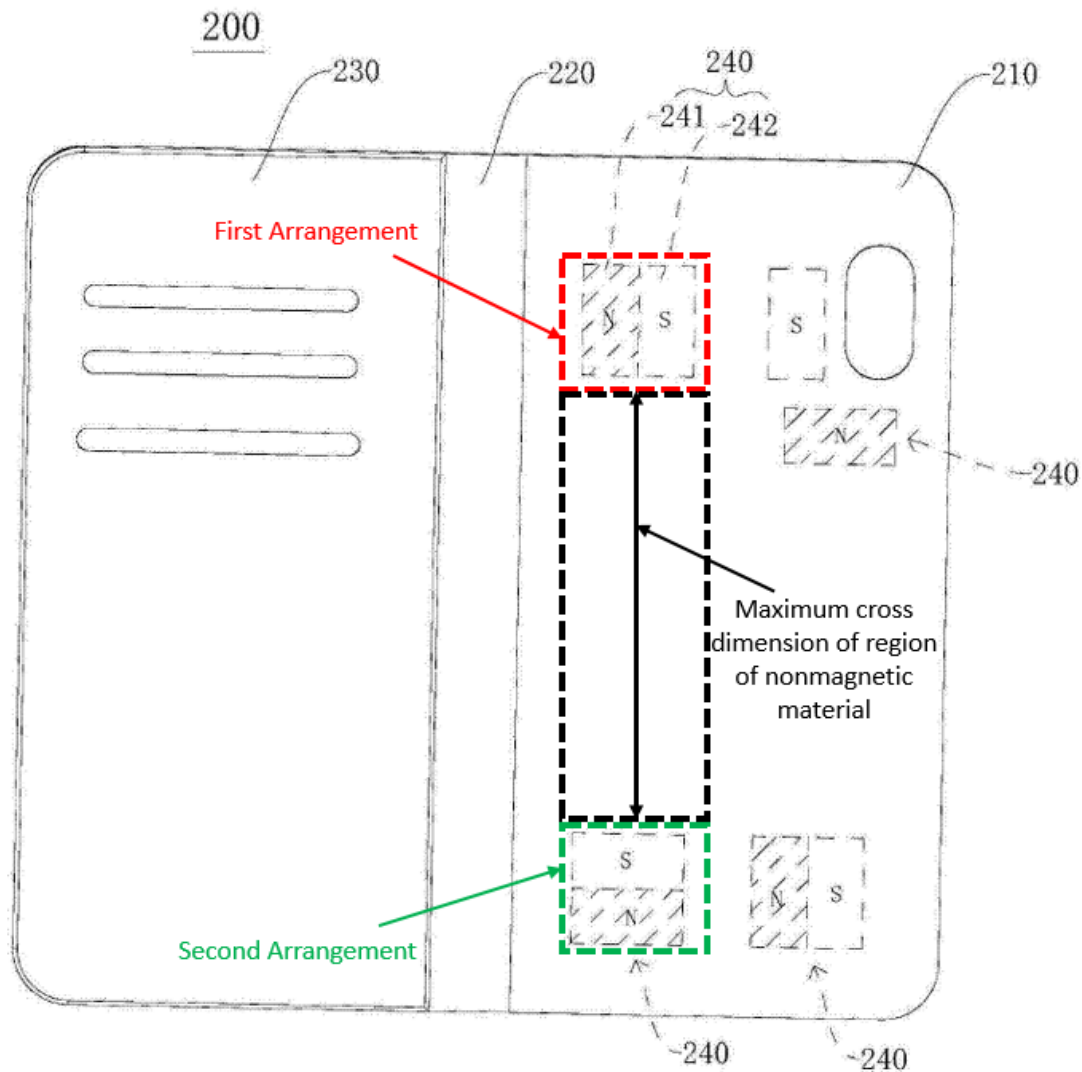
EX1008, FIG. 4 (annotated).

⁷ Goto teaches wallets made from leather and plastic. EX1012, 11:48-55, 12:9-19. Should 1LSS argue Zhu does not render this limitation obvious, it would have been obvious in view of Goto that Zhu's cover be made from leather or plastic because such materials were common for wallets. EX1003, ¶303.

g. [1.E.2]

Zhu discloses or renders obvious [1.E.2]. EX1003, ¶¶305-310. Like [1.E.1], the '641 specification does not describe [1.E.2] or explain its importance, and 1LSS pointed only to Figure 16A as alleged support during the appeal. EX1002, 327. Figure 16A shows the first and opposite polarity regions abut one another, so that the claimed “distance between any two immediately adjacent first polarity and opposite polarity regions in the first or second arrangement” would be zero. Element [1.E.2] is thus satisfied by any two arrangements that are separated geographically. 1LSS introduced [1.E.2] via amendment to indicate that the “first and second arrangement were *separated geographically* so as not to be part of the same grouping of magnetic material.” EX1002, 263, 266.

In any event, as discussed in [1.E.1], Zhu describes the groups at different corners of a rectangle. And, in Figure 4, Zhu shows first polarity and opposite polarity regions for each group immediately adjacent. EX1008, FIG. 4. Zhu thus shows that a maximum cross dimension of a region separating second magnet groups from one another is larger than the separation between any two adjacent magnetic regions, such as the regions including magnets 241 and 242 (which are right next to each other). EX1003, ¶308.



EX1008, FIG. 4 (annotated).

Any argument that Figure 4 of Zhu cannot be relied on because Zhu does not disclose that the figures are drawn to scale would be misplaced. First, Zhu describes the magnet groups as at corners of a rectangle, and thus provides relative dimensions. EX1008, ¶29; EX1003, ¶¶308-309. Second, this argument would fail under *Epstein* because, again, the '641 specification does not describe the claimed “maximum cross dimension” of the “region of nonmagnetic material.” Zhu shows

these features in the same manner as Figure 16A of the '641 patent allegedly does, as 1LSS argued during prosecution. And Zhu shows that the first and second arrangements are separated geographically, as 1LSS argued during prosecution. EX1002, 266.

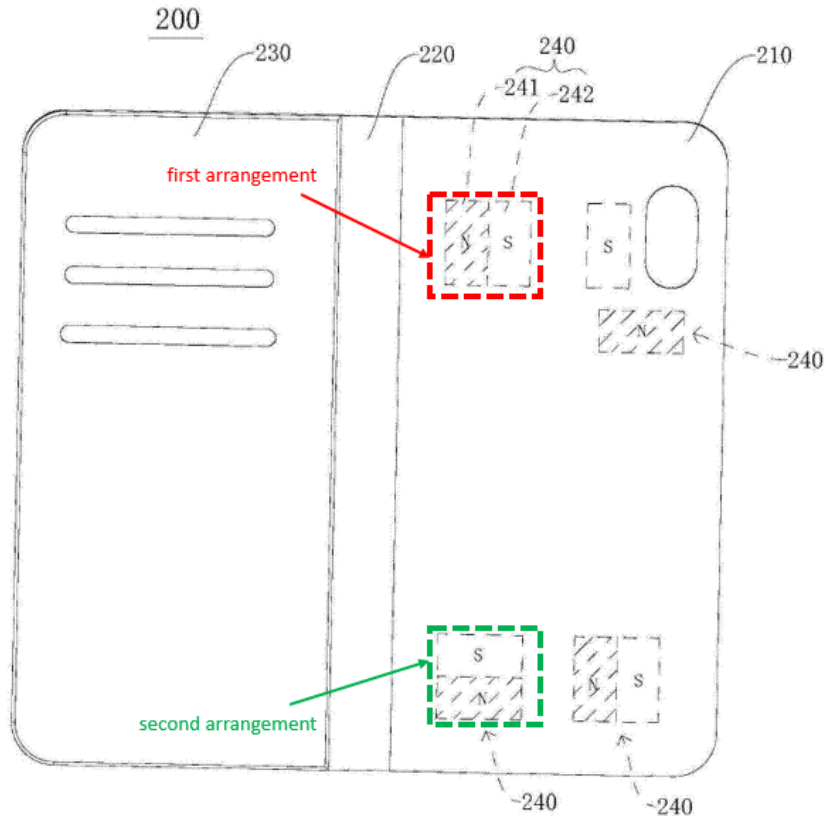
h. [1.F.1]

Zhu-Kinshi renders obvious [1.F.1]. EX1003, ¶¶311-313. Zhu discloses that the “mobile phone clip 200 ... cooperates with the mobile phone case 100 ... to form a phone case assembly.” EX1008, ¶31. Here, “each magnet in the plurality of second magnet group[s] 240 interacts with a corresponding magnet in a corresponding first magnet group 140 to accurately position and fix the mobile phone clip 200 to the mobile phone case 100.” EX1008, ¶33. When combined with Kinshi, the Zhu-Kinshi wallet magnetically couples to a mobile device. EX1003, ¶¶311-312 (explaining that [1.F.1] does not require coupling directly between the wallet and the mobile device; coupling via a case is sufficient).

i. [1.F.2]

Zhu-Kinshi renders obvious [1.F.2]. EX1003, ¶¶314-319. Zhu discloses that its magnetic arrangements cause the mobile phone case and the cover to be “automatically and accurately positioned” when connected. EX1008, ¶¶4-6, 17, 34. Regarding the configuration of magnets shown in Figure 4 of Zhu, it has only one degree of symmetry when rotated about an axis normal to the plane of the page.

EX1003, ¶¶315-318.



EX1008, FIG. 4 (annotated).

This configuration of magnets requires that the mobile phone case and the cover adopt one specific orientation with respect to one another, such as the portrait orientation shown Zhu's Figure 4. This understanding of "specific orientation" is consistent with dependent claim 7, which defines "specific orientation" as "exactly one orientation." When combined with Kinshi, the Zhu-Kinshi wallet adopts a specific orientation on the mobile device. EX1003, ¶¶318-319.

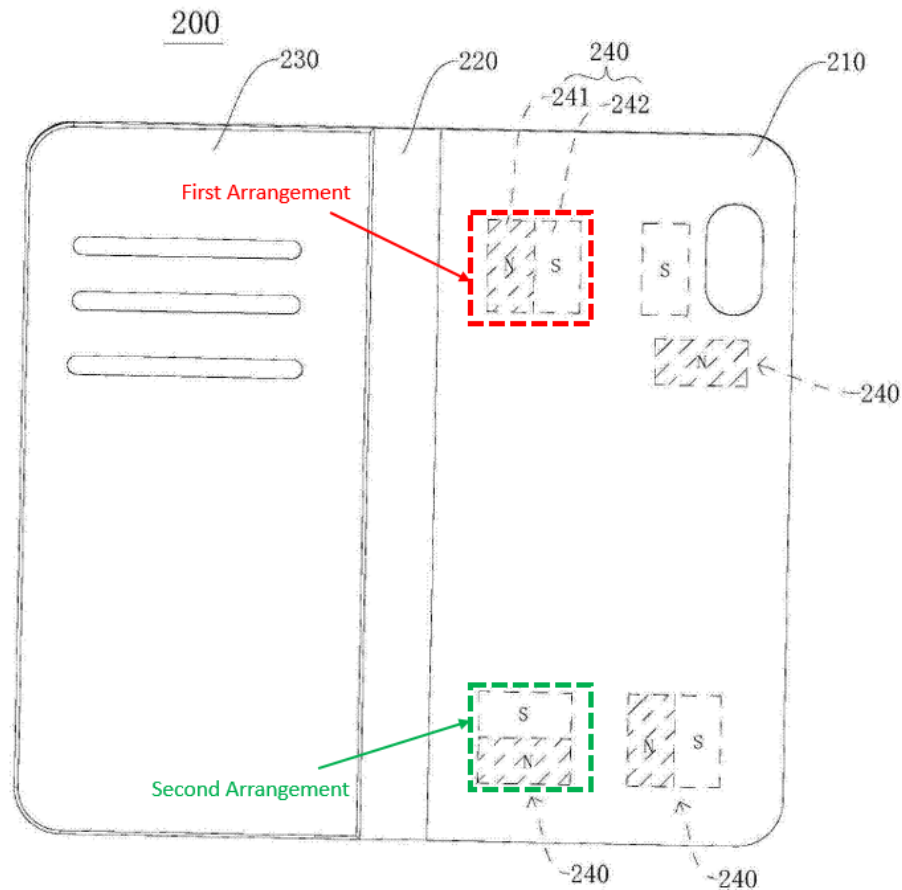
2. Claim 5

Zhu-Kinshi-Goto renders claim 5 obvious. Regarding [5.P]-[5.C] and [5.E.1]-[5.F.2], see [1.P]-[1.C] and [1.E.1]-[1.F.2] above. Sections V, XI.D.1. [5.D] recites “a metallic plate between the first arrangement and the compartment.” Goto’s magnetic-shielding plates are made of iron foil, and a POSA would have known that iron is a metal. EX1003, ¶¶320-321.

3. Claim 11

Zhu-Kinshi-Goto renders claim 11 obvious. Regarding [11.P]-[11.C], see [1.P]-[1.C] above; regarding [11.E.1]-[11.E.2] see [1.F.1]-[1.F.2] above. Sections V, XI.D.1.

Zhu discloses [11.D]. EX1003, ¶¶322-326. Figure 4 of Zhu depicts four second magnet groups 240 positioned at corners of back plate 210. Section XI.D.1.c.



EX1008, FIG. 4 (annotated).

Zhu discloses that “[t]he magnets 241 and 242 of at least one second magnet group 240 are arranged horizontally, and the magnets 241 and 242 of at least one second magnet group 240 are arranged vertically.” EX1008, ¶30. Zhu explains that “the arrangement direction only needs to meet the following conditions: the magnets of at least one first magnet group are arranged horizontally, and the magnets of at least one first magnet group are arranged vertically.” EX1008, ¶29. Thus, the only constraint Zhu places on the arrangements of second magnet groups

is that the first magnetic arrangement have a different orientation from that of the second arrangement, as claimed. EX1003, ¶¶325-326.

E. Dependent Claims 2-4, 6-7

1. Claim 2

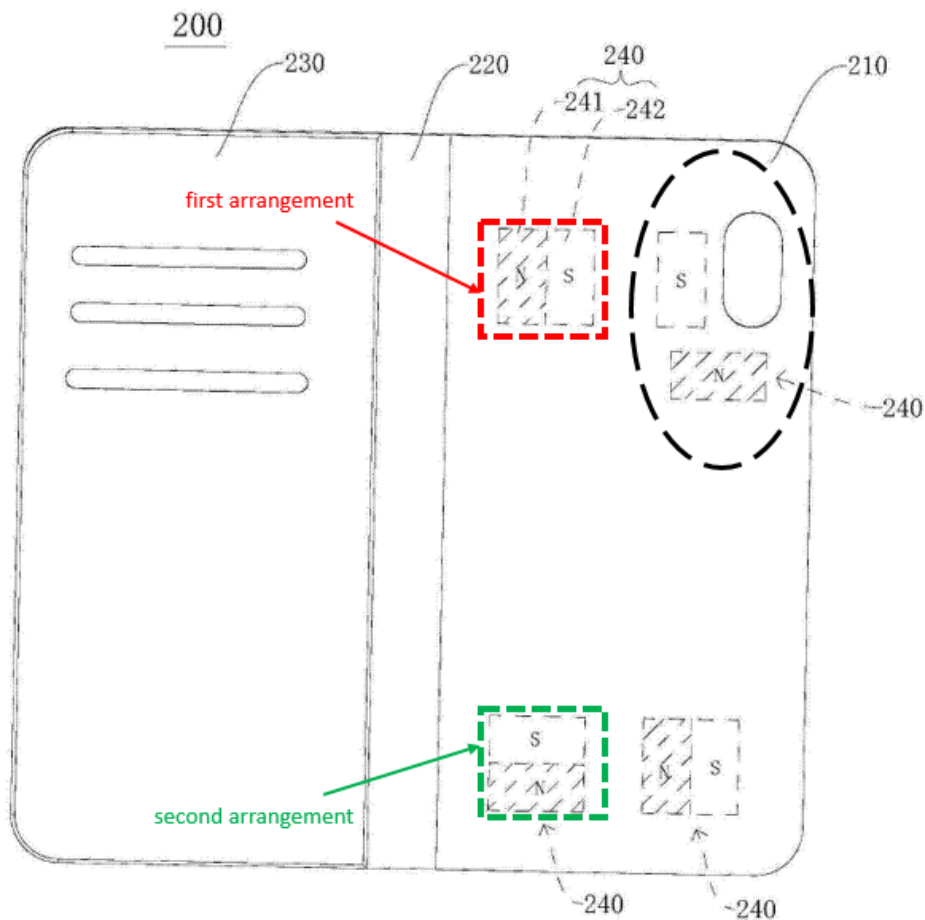
Zhu-Kinshi renders claim 2 obvious. EX1003, ¶327. The Zhu-Kinshi wallet includes at least one pocket for storing a card such as a credit card. *See* [1.A]. Kinshi discloses that the “openings of the pockets 5 are formed in a direction along the horizontal direction in Figure 1 to allow cards to be slid in and out in the vertical direction.” EX1010, ¶15. Kinshi’s “openings” in pockets 5 “allow cards to be slid in and out” and thus are “content removal slot[s].” *Id.*; EX1003, ¶327.

2. Claim 3

Zhu-Kinshi renders claim 3 obvious. EX1003, ¶¶328-332. Zhu discloses that the magnetic arrangements “accurately position and *fix* the mobile phone clip to the mobile phone case.” EX1008, ¶¶15, 17. Kinshi discloses that a mobile phone is “secured in place” when coupled to its folio-style wallet via mutual magnetic attraction. EX1010, ¶¶7, 21. A POSA would have understood and found obvious that the attractive force described in Zhu and Kinshi is sufficient to support the weight of a mobile device to prevent unintentional detachment from the wallet. EX1003, ¶¶328-332. This is particularly true given the purpose of both references is to secure a folio-case to a mobile phone.

3. Claim 4

Zhu renders claim 4 obvious. EX1003, ¶¶333-338. Figure 4 of Zhu shows three second magnet groups 240 as being formed without any space between adjacent magnets 241 and 242. The fourth second magnet group 240 (shown in the black oval below) is formed with spacing between adjacent magnets 241 and 242 due to the presence of a lens hole (not numbered). EX1008, ¶27. A POSA would have understood that the first three second magnet groups 240 are directly abutting and immediately adjacent one another, and that directly abutting magnets at least suggests a spacing of less than 2 mm, as claimed. EX1003, ¶¶333-335.

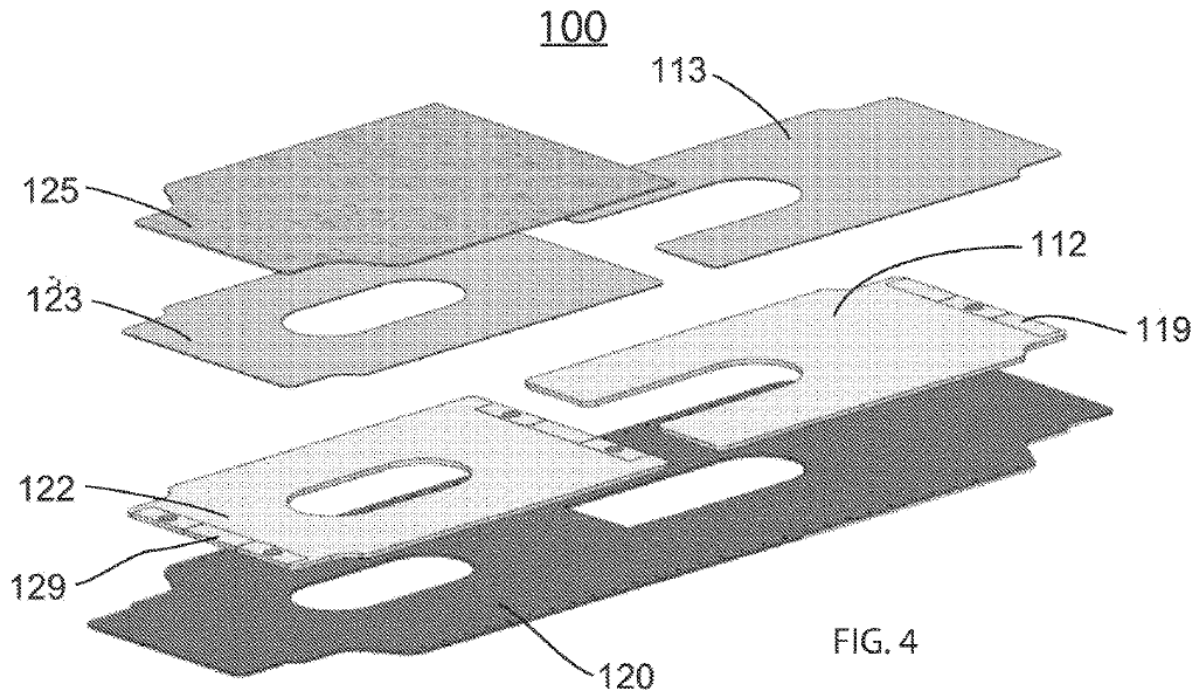


EX1008, FIG. 4 (annotated).

Zhu's Figure 4 discloses or suggests the specific range claimed here (i.e., zero to 2mm). Although "arguments based on measurement of a drawing" without more typically have low probative value, *In re Wright*, 569 F.2d 1124, 1127 (C.C.P.A. 1977), drawings must be evaluated for "what they reasonably disclose and suggest to one of ordinary skill in the art." *In re Aslanian*, 590 F.2d 911, 914 (C.C.P.A. 1979). Even an unlabeled coordinate axis is sufficient to allow inferences and relative comparisons by a POSA. *Paice*, 722 F. App'x at 1021-23. Zhu's Figure 4 plainly illustrates two types of second magnet groups 240—several without any space between the constituent magnets 241 and 242 and one having space between the constituent magnets—and thus provides enough for a POSA to "make rough estimates based on relative comparisons" between the two types of second magnet groups. *Id.*

Further, the '641 specification does not accord any importance to the claimed range, and during prosecution 1LSS pointed to Figure 4 of the '641 patent as alleged support. EX1002, 328. Figure 4 (below) shows magnetic arrangements (e.g., 119, 129) in which the magnets abut each other, the same as in Zhu. 1LSS may not hold the prior art "to a different standard than it holds the claimed invention" by requiring explicit disclosure of the claimed range. *Paice*, 881 F.3d at 902. Nor may it require a level of detail in prior art that is not provided in its own

specification. *Epstein*, 32 F.3d at 1568. Zhu thus shows the claimed range in the same way as the '641 patent, and renders the range obvious. EX1003, ¶¶336-338.



EX1001, FIG. 4.

4. Claim 6

Zhu and Kinshi both disclose claim 6. EX1003, ¶¶339-341. During prosecution, 1LSS explained that “planar” is “to distinguish from arcuate surfaces having a significant radius of curvature and surfaces that have protrusive attachment features.” EX1002, 195. Zhu describes back plate 210 as just that—a plate—denoting a flat sheet of material. EX1008, ¶30. Zhu also describes forming “concave cavities” in which to dispose magnets in the body 110 of the mobile

phone case to which mobile folio/clip 200 attaches. EX1008, ¶25. A POSA would have understood that such cavities allow the magnets to be “buried” into the body 110, to provide a “substantially planar” surface. EX1003, ¶340.

Kinshi describes forming each of base 3 and holding plate 7 out of a “plurality of sheet-shaped magnets,” EX1010, ¶18, which also connotes “substantially planar” surfaces, EX1003, ¶341.

5. Claim 7

Zhu discloses claim 7. EX1003, ¶342. The configuration of magnets in Zhu has only one degree of rotational symmetry and supports only a portrait orientation in Figure 4 (i.e., “exactly one orientation”). *Id.*; Section XI.D.1.i. Notably, 1LSS did not identify support for this limitation in the appeal. EX1002, 328.

XII. 2B: ZHU-KINSHI-GOTO-COX RENDERS OBVIOUS CLAIM 3

It would have been obvious to apply Cox’s teachings in paragraphs 51-52 to the Zhu-Kinshi-Goto wallet such that the magnetic arrangements “are sufficient to support a weight of the mobile device,” as claimed. A POSA would have been motivated and had a reasonable expectation of success based on Cox’s express teachings, as discussed in Section VII. EX1003, ¶¶343-347.

XIII. 2C: ZHU-KINSHI-GOTO-LAUDER RENDERS OBVIOUS CLAIM 4

Lauder describes a “magnetic attachment mechanism [that] can be used to releasably attach an accessory device to an electronic device.” EX1018, Abstract, 1:25-27; EX1003, ¶¶135-137. Lauder discloses a plurality of magnets disposed

adjacent to each other on the electronic device (or the case thereof), and a corresponding plurality of magnets disposed on the accessory device. EX1018, 13:39-45, 16:63-17:10. Figure 11A below shows magnetic assembly 702 that includes magnets 712a-712c. EX1018, 22:9-24:5. Lauder discloses that, when magnets of opposite polarities are disposed next to each other, they may be “magnetically attached to each other,” so that the magnetic bond between the magnets may “maintain the integrity of the sequence of magnets in the magnetic assembly.” EX1018, 23:21-30. A POSA would have understood that Lauder’s teaching that the magnets may be “attached to each other” means there is no spacing between the magnets, which is “less than 2 mm,” as claimed. EX1003, ¶¶348-351.

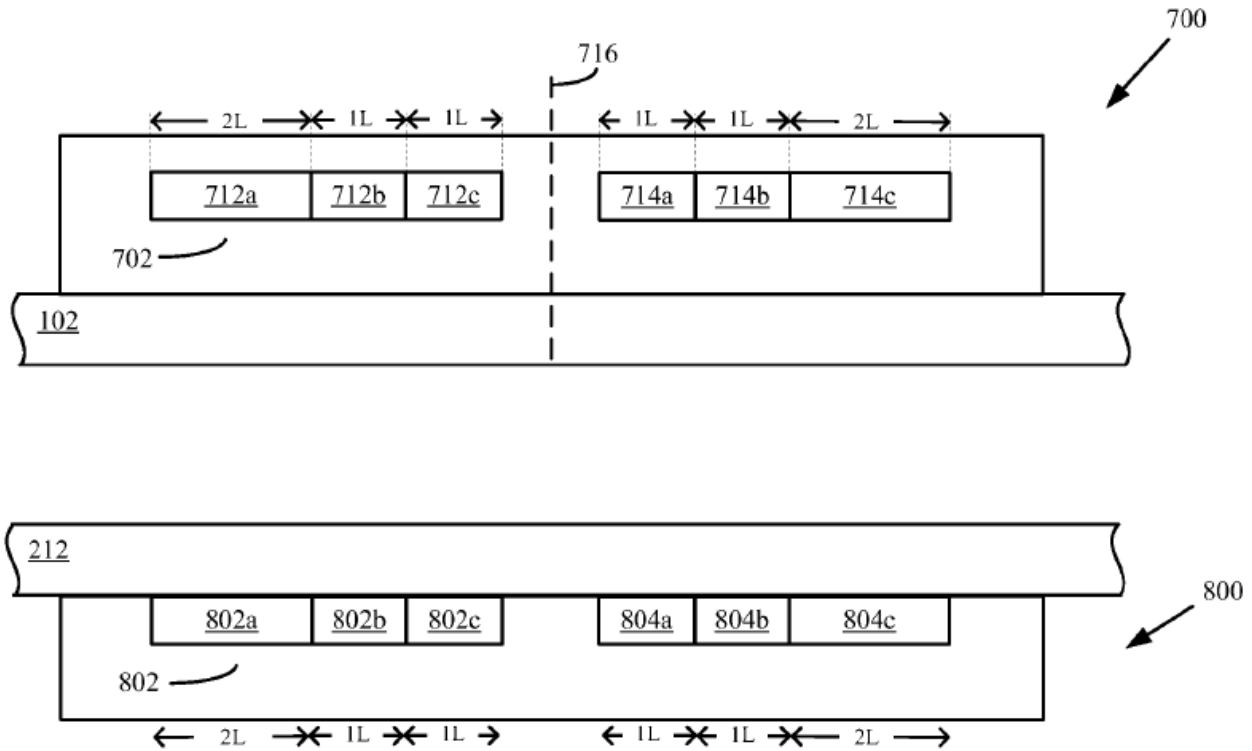


Fig. 11A
EX1018, FIG. 11A.

It would have been obvious to space the magnets in the magnetic assemblies of the Zhu-Kinshi-Goto wallet “less than 2 mm,” as claimed. Lauder’s express teaching that attaching adjacent magnets of opposite polarity would “maintain the integrity of the sequence of magnets in the magnetic assembly,” EX1018, 23:26-30, would have motivated a POSA to make the combination. EX1003, ¶352. POSAs would have had a reasonable expectation of success because they would have understood the properties of magnets, and the resulting magnetic

arrangements (magnets being attached with no spacing) would have been predictable. *Id.*

**XIV. 2D: ZHU-KINSHI-GOTO-HAYMOND RENDERS OBVIOUS
CLAIM 9**

A POSA would have been motivated to modify the Zhu-Kinshi-Goto wallet to include Haymond's finger strap on the back of Zhu's back plate 210 (i.e., "opposite the device side surface") in order to tether the wallet (and thus the device) to the user's hand and prevent the user from dropping the wallet. EX1015, 1:18-22; EX1003, ¶¶353-358. A POSA also would have had a reasonable expectation of success because Haymond provides a simple technique for forming a finger strap in the surface of a wallet such that it tethers a mobile phone to a user's hand. Such a modification merely amounts to using Haymond's known technique to improve a similar device ready for improvement. Alternatively, such a modification is merely combining known prior art elements to achieve the predictable result of a wallet for a handheld device that includes a finger strap. EX1003, ¶359.

**XV. 2E: ZHU-KINSHI-GOTO-MITSUYAMA RENDERS OBVIOUS
CLAIM 10**

A POSA would have been motivated to modify the compartments/pockets in the Zhu-Kinshi-Goto wallet to include Mitsuyama's tapering. EX1003, ¶¶360-370; Section X; EX1016, FIG. 8, 4:1-19; EX1016, 1:11-25, 3:10-28, FIGs. 3, 13-14 . A

POSA would have known that tapering along with a finger window would improve a user's ability to remove cards from the wallet. EX1003, ¶364; EX1016, 1:26-35, 4:37-41, FIGs. 3, 8, 13-14. Such a modification would have merely amounted to changing the openings in Kinshi's pockets 5 to include a taper. Zhu-Kinshi-Goto-Mitsuyama would realize a folio-style wallet for a mobile phone that includes tapering. EX1003, ¶364.

A POSA would have also had a reasonable expectation of success because the modification would merely amount to using Mitsuyama's tapering to improve the usability of the Zhu-Kinshi-Goto wallet by providing easier means to access and retrieve cards. Alternatively, such a modification constitutes simply combining known prior art elements to achieve the predictable result of a wallet that includes tapering. EX1003, ¶365.

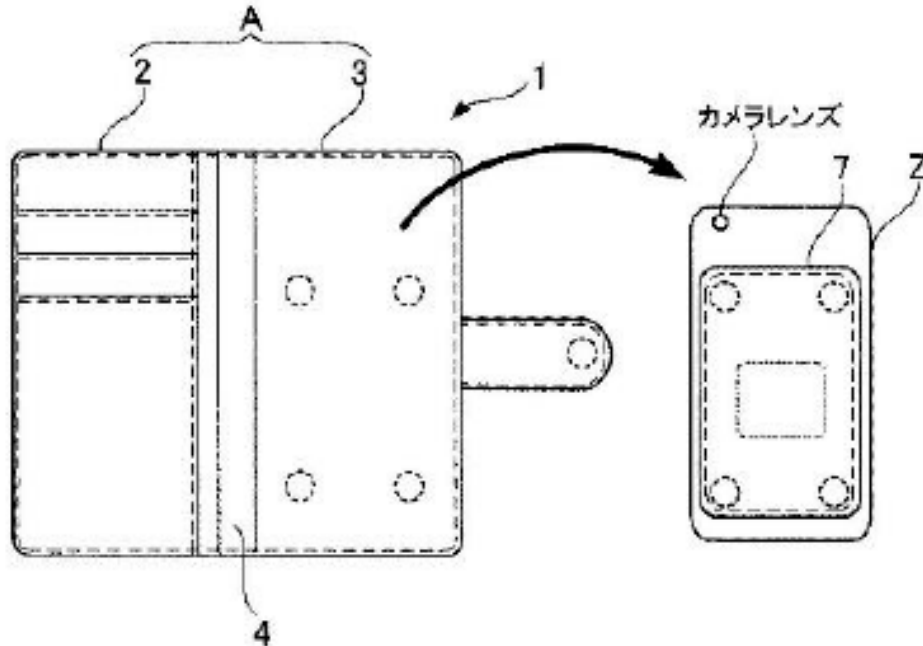
XVI. 3A: KINSHI RENDERS OBVIOUS CLAIM 11

A. Independent Claim 11

1. [11.P]

Kinshi discloses [11.P]. EX1003, ¶¶371-375. 1LSS explicitly stated that a "mobile device" is not a structural limitation of the claims. EX1002, 195. Regardless, Kinshi discloses "a mobile phone case comprising a cover piece and a base piece." EX1010, ¶6. Kinshi's base piece 3 includes a plurality of "base-side securing parts 81" (i.e., magnets). EX1010, ¶17. Cover piece 2 includes a "plurality of pockets 5 for storing cards." EX1010, ¶15. A mobile phone Z attaches

to the mobile phone case via holding panel 7 that includes “a plurality of holding-panel-side securing part[s] 82” (i.e., magnets). EX1010, ¶18.



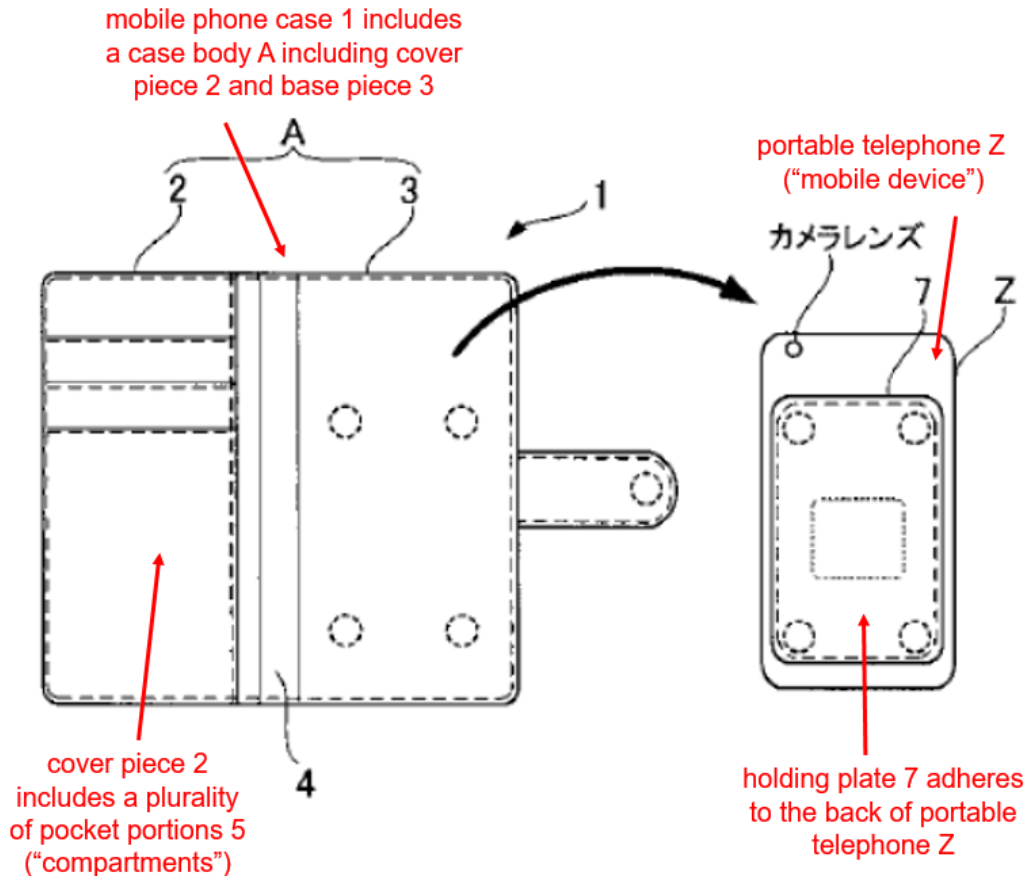
EX1010, FIG. 3.

Kinshi's holding panel 7 attaches to mobile phone Z (or to a case on mobile phone Z) by an adhesive sheet 71. EX1010, ¶20. By this configuration, “when putting a mobile phone in the mobile phone case, the holding panel is automatically secured in place on the base piece by the mutual attraction (magnetic attraction)” of the magnets in the holding panel and in the base piece. EX1010, ¶7.

2. [11.A]

Kinshi discloses [11.A]. EX1003, ¶¶376-377. Cover piece 2 of Kinshi's mobile phone case 1 includes a “plurality of pockets 5 for storing cards.” EX1010, ¶15. Each pocket 5 defines a compartment with an opening “to allow cards to be

slid in and out in the vertical direction.” *Id.* In addition, Kinshi’s mobile phone case includes a base piece 3, to which a mobile phone Z is attached via a set of magnets. EX1010, ¶21.



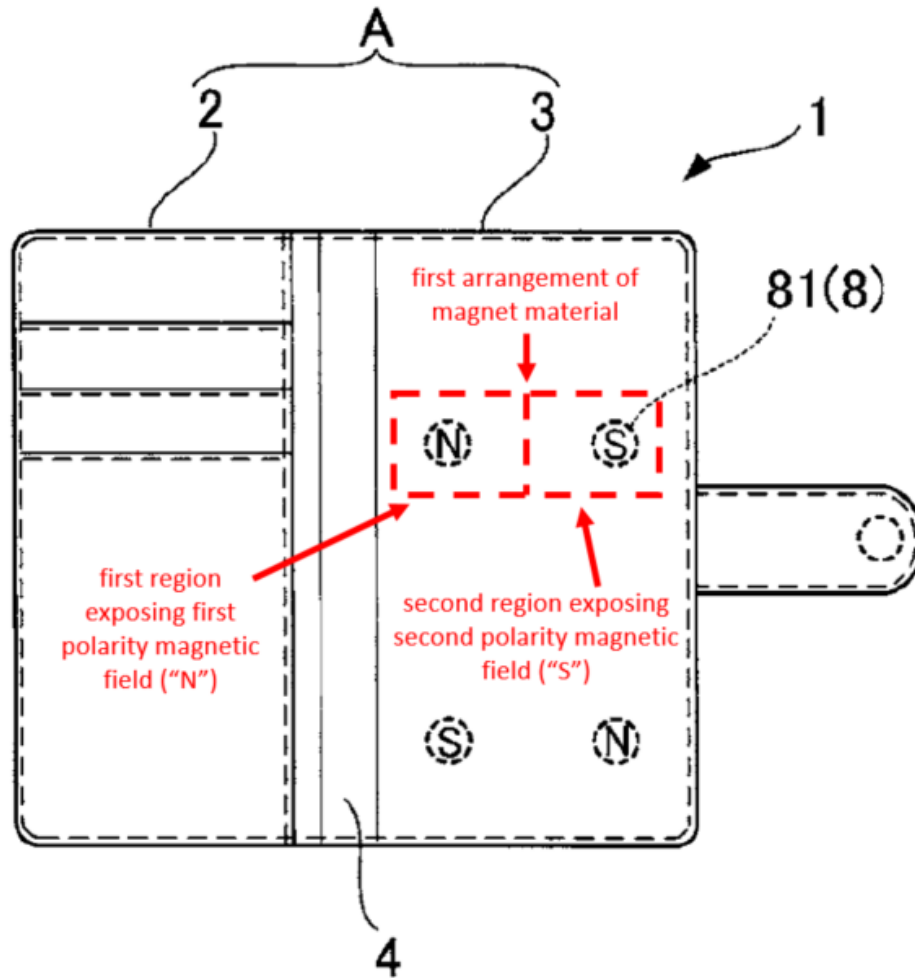
EX1010, FIG. 3 (annotated).

Kinshi’s mobile phone case 1 meets the claimed “body.” Kinshi’s pockets 5 each correspond to a “compartment” defined by the body of case 1. Kinshi’s base piece 3 meets the claimed device side surface of mobile phone case 1. EX1003, ¶377.

3. [11.B]

Kinshi discloses or renders obvious [11.B]. EX1003, ¶¶378-382. Kinshi’s

Figure 4 shows a configuration of base-side securing parts 81, which are formed of magnets. EX1010, ¶26. Due to the rectangular shape of holding plate 7, the top two magnets are separated from the bottom two magnets, and thus the top two magnets constitute a first arrangement of magnetic material. EX1010, ¶¶17, 26, FIG. 4. The four base-side securing parts (magnets) 81 are further arranged clockwise to have alternating magnetic poles. *Id.* The top two magnets include a first (left) magnet exposing a magnetic north pole and a second (right) magnet exposing a magnetic south pole. *Id.* Kinshi's top two magnets of the four base-side securing parts 81 in base piece 3 create adjacent regions that expose a first polarity magnetic field at the device side surface ("N") and the opposite polarity magnetic field at the device side surface ("S"). EX1010, ¶¶21, 23, 25-27; EX1003, ¶381.



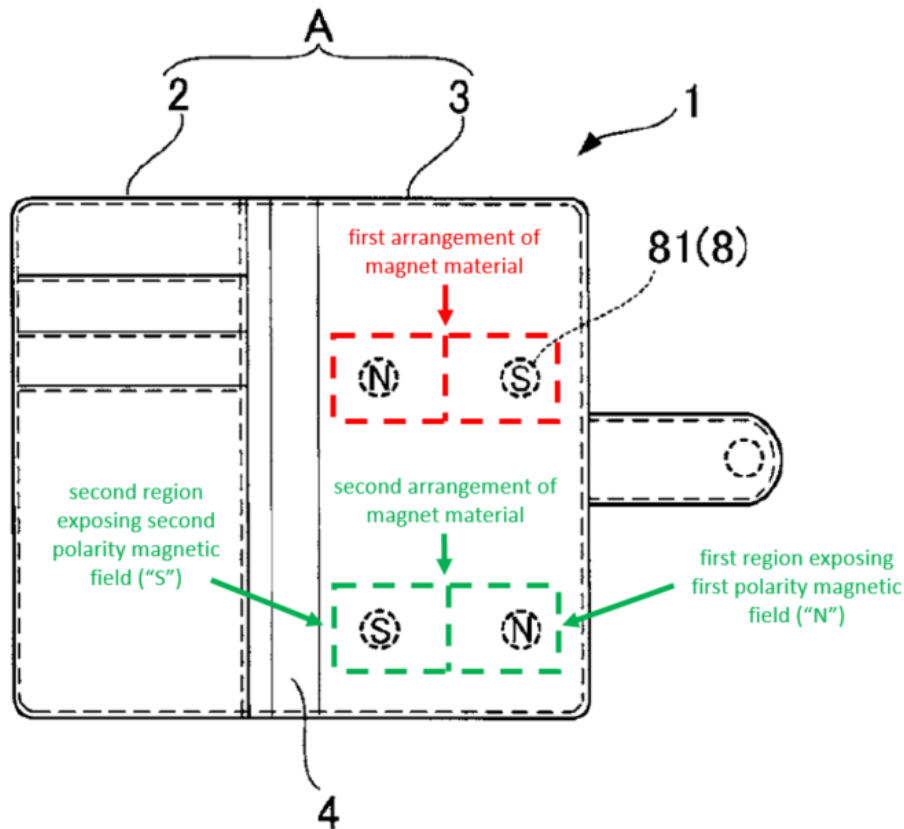
EX1010, FIG. 4 (annotated).

Should 1LSS argue that Kinshi does not expressly disclose the claimed adjacent regions, they would have been obvious. A POSA would have known that Kinshi's magnets produce magnetic fields, forming regions surrounding the magnets ("N" and "S") that would be adjacent in Kinshi's Figure 4. EX1003, ¶382.

4. [11.C]

Kinshi discloses or renders obvious [11.C]. EX1003, ¶383. The bottom two magnets 81 in Figure 4 define a second magnetic arrangement that expose opposite polarity magnetic fields at the device side surface in a similar manner as described

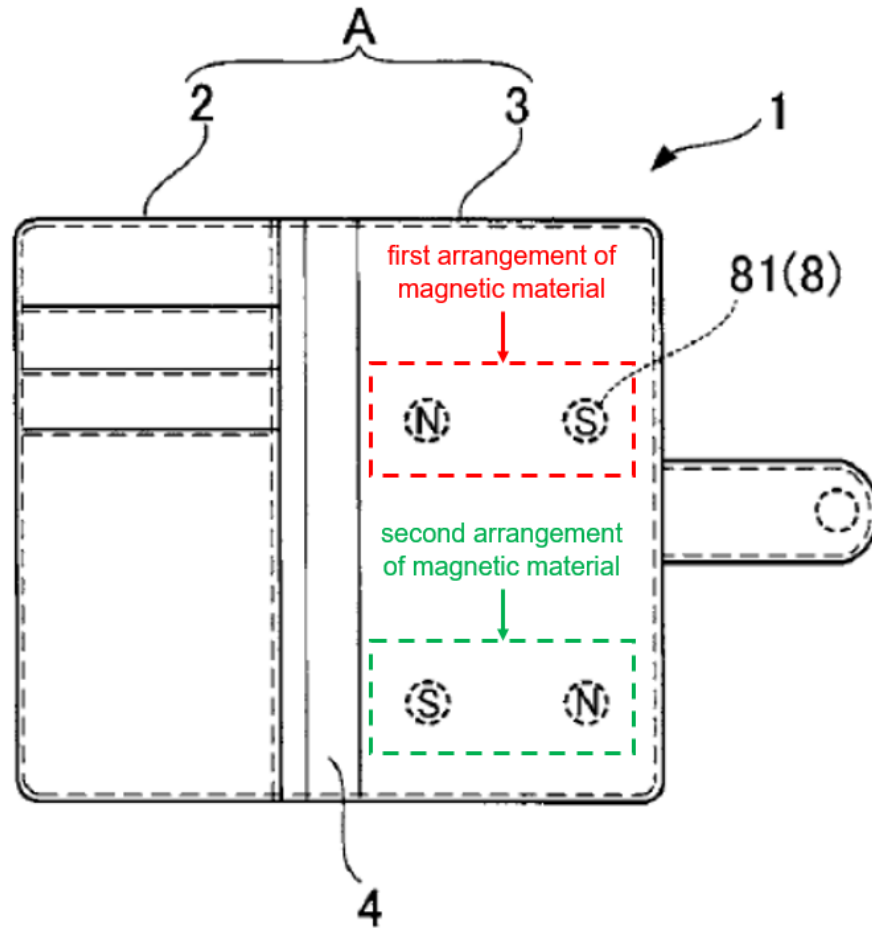
for [11.B]. *Id.*; EX1010, ¶26.



EX1010, FIG. 4 (annotated).

5. [11.D]

Kinshi discloses [11.D]. EX1003, ¶¶384-385. Kinshi's Figure 4 shows that the top group of two magnets 81 (the "first arrangement") has a different orientation (N-S going from left to right) than the bottom group of two magnets 81 (the "second arrangement") (N-S going from right to left). *Id.*; EX1010, ¶26.



EX1010, FIG. 4 (annotated).

6. [11.E.1]

Kinshi discloses [11.E.1]. EX1003, ¶¶386-387. Kinshi's mobile phone case 1 is configured so that "holding panel 7 holding the mobile phone is detachably mounted to the base piece 3 by the magnetic force of magnets." EX1010, ¶21. When the mobile phone is placed in mobile phone case 1, "the holding plate 7 is automatically secured in place on the base piece 3 by the mutual attraction (magnetic attraction) of the magnet[s] provided on the holding panel 7 and the magnet[s] provided on the base piece 3." *Id.* Thus, Kinshi's magnets 81

concurrently couple to corresponding magnets in holding plate 7 attached to the mobile phone to hold the mobile phone in place with respect to the mobile phone case. EX1003, ¶¶386-387.

7. [11.E.2]

Kinshi discloses [11.E.2]. EX1003, ¶¶388-391. Kinshi's configuration of magnets 81 have 180° rotational symmetry about an axis extending out of the page. EX1010, FIG. 4; Section XVI.A.5. Thus, Kinshi's magnets 81 and the corresponding configuration of magnets 82 in holding plate 7 allow for the mobile phone Z to attach to mobile phone case 1 in only two directions (portrait, right-side up or upside-down). This understanding of the claimed "specific orientation" as corresponding to only two possible orientations is consistent with the specification of the '641 patent and dependent claim 8, which depends from claim 1 that recites the same language in element [1.F.2], where claim 8 further recites that "the first and second arrangement permit coupling to the mobile device in exactly two orientations."

Accordingly, Kinshi's configuration of magnets 81 and corresponding magnets 82 cause the mobile phone Z and the mobile phone case 1 to adopt a specific orientation with respect to one another. EX1003, ¶¶388-391.

XVII. 3B: KINSHI-GOTO RENDERS OBVIOUS CLAIMS 1-3, 5, 6, 8

A. Motivation to Combine

A POSA would have been motivated to modify Kinshi's wallet to include

Goto's iron-foil, magnetic-shielding plates to avoid erasing data stored magnetically on cards. EX1003, ¶¶392-397. Goto teaches such shielding is needed because the data stored on magnetic cards may be negatively affected or become unusable when exposed to a magnetic field. EX1012, 2:14-21. To avoid such damage, Goto discloses including magnetic-shielding plates made of iron foil embedded within the front and back walls of a "wallet" that holds cards. EX1012, 12:9-27.

Cards stored in Kinshi's wallet would be susceptible to magnetic damage. Kinshi teaches that mobile phone may be removed from the wallet to take a photo. EX1010, ¶4. When the mobile phone is removed and the folio is closed, the cards could be exposed to the magnets in base piece 3 of Kinshi, exposing the cards to potential magnet damage. EX1003, ¶¶395-396. Second, even when the mobile phone is attached to the folio, it was common for a user to fold the cover back (like bending the spine of a paperback novel) when using the mobile phone while in the folio. *Id.* Folding the cover back in this manner would likewise expose the cards to the magnets in base piece 3 of Kinshi. *Id.*

Accordingly, a POSA would have been motivated to modify Kinshi's wallet to include Goto's magnetic-shielding plates in both the front and back of Kinshi's cover piece 2 (as Goto teaches) to prevent magnetic damage when the mobile phone is removed and when the folio is folded back, respectively. EX1003, ¶397.

Such a modification would predictably result in Kinshi's wallet protecting cards from magnetic damage. *Id.* A POSA would have had a reasonable expectation of success in making this modification because it simply combines prior art elements (folio-style wallet and magnetic shielding) according to known methods to achieve the predictable result of protecting cards from magnetic damage. Further, the modification applies a known technique (magnetic shielding) to improve a similar wallet in the same way as Goto. *Id.*

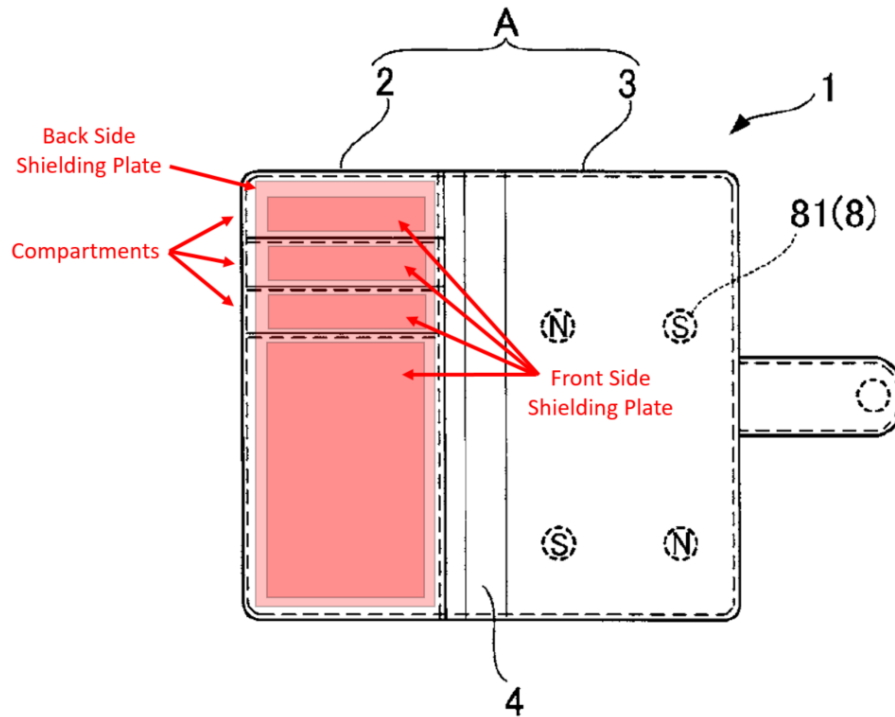
B. Claims 1, 5

Regarding [1.P]/[5.P]-[1.C]/[5.C], see [11.P]-[11.C] above; regarding [1.F.1]/[5.F.1]-[1.F.2]/[5.F.2], see [11.E.1]-[11.E.2] above. Section XVI.A.

1. [1.D]/[5.D]

Kinshi-Goto teaches [1.D]/[5.D]. EX1003, ¶¶398-402. In the Kinshi-Goto wallet, Goto's iron-foil, magnetic-shielding plates would be embedded (1) in front-side of cover piece 2 where pockets 5 are located to protect cards from magnets in base piece 3 when the phone is removed and the folio is closed, and (2) in the back-side of cover piece 2 to protect cards from magnets in base piece 3 when the folio is folded over. *Id.*; Section XI.D.1.e. The plate in the front-side would be "between the first and second arrangements and the compartment," as claimed, when the phone is removed and the folio is closed. And the plate in the back-side would also be "between the first and second arrangements and the compartment,"

when the folio is folded back. EX1003, ¶¶401-402. Providing a plate on the front or back satisfies the claims. A POSA would have understood iron foil is ferromagnetic (claim 1) and is metallic (claim 5). *Id.*



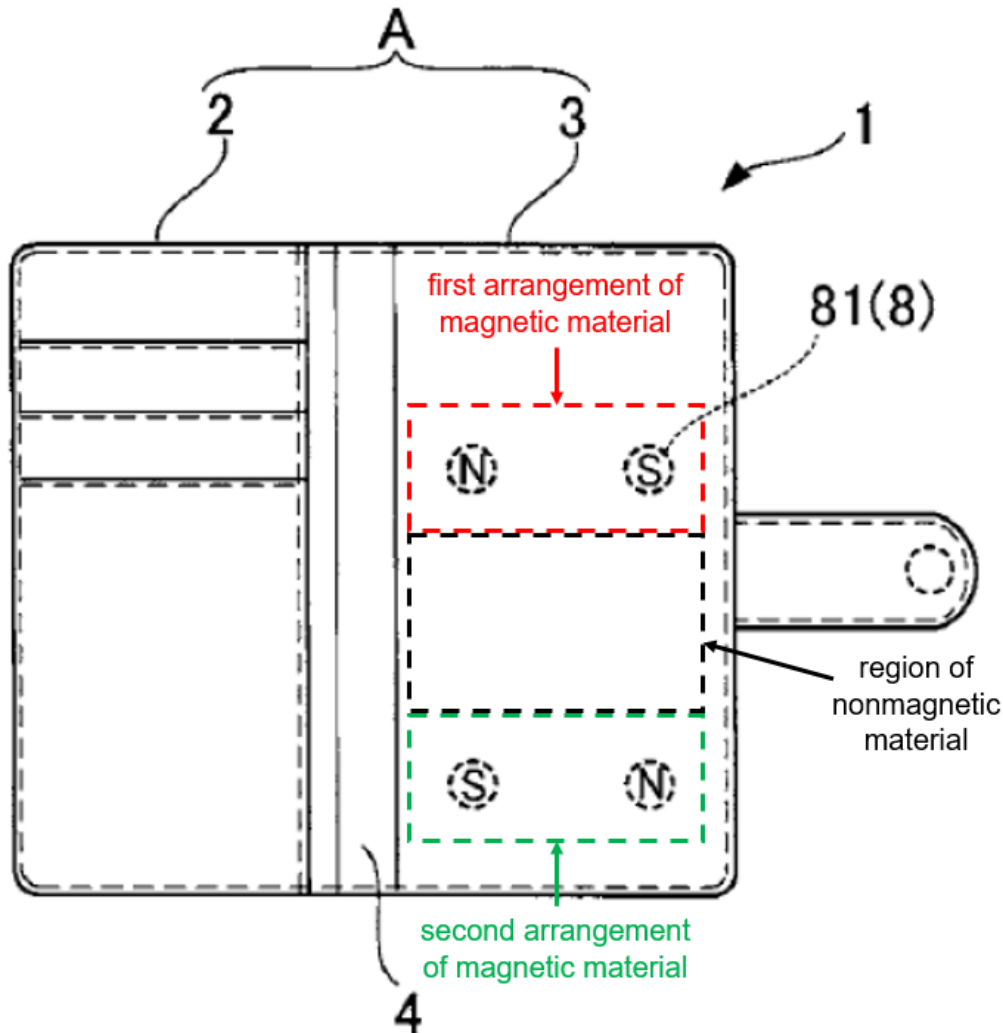
EX1003, ¶401, FIG. H (annotated to show insertion of magnetic-shielding plates).

2. [1.E.1]/[5.E.1]

Kinshi renders obvious [1.E.1]/[5.E.1]. EX1003, ¶¶403-405. Kinshi discloses a rectangular configuration of magnets wherein the top two magnets are spatially separated from the bottom two magnets. EX1010, FIG. 4. Shown below, these two arrangements of magnets are separated by a region (dashed black line) that does not include any magnets. Thus, Kinshi's arrangements of magnets are

physically separated by a region of nonmagnetic material, as claimed. EX1003,

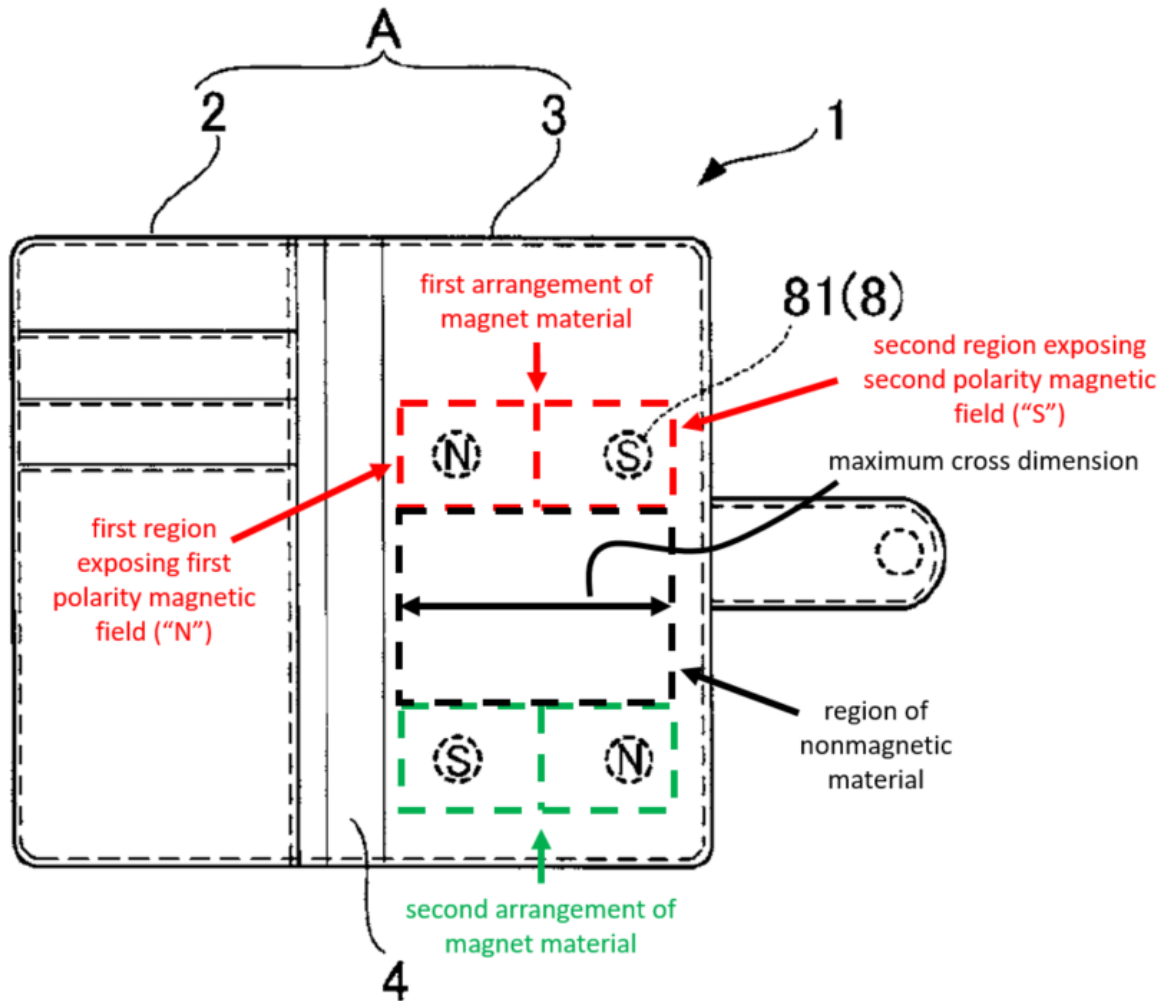
¶¶404-405.



EX1010, FIG. 4 (annotated).

3. [1.E.2]/[5.E.2]

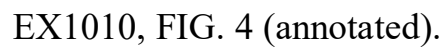
Kinshi renders obvious [1.E.2]/[5.E.2]. EX1003, ¶¶406-411. Kinshi's Figure 4 shows that a maximum cross dimension of the region of nonmagnetic material is equal to the length of the first arrangement, and thus is greater than the spacing between the two magnets 81 provided within the first arrangement.



EX1010, FIG. 4 (annotated).

Moreover, Kinshi's magnets 81 "are disposed at predetermined positions on the base piece 3 corresponding to the four corners of the holding panel 7."

EX1010, ¶18. Holding plate 7 is formed to have a rectangular shape, with holding-panel-side securing parts (magnets) 82 "respectively disposed at the four corners of the holding panel." EX1010, ¶¶9-10. Given this rectangular configuration of magnets, Kinshi's Figure 4 also shows that the region of nonmagnetic material has a maximum cross dimension (length direction of the rectangle) that is greater than



C. Claims 2-3, 6, 8

1. Claim 2

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2. Claim 3

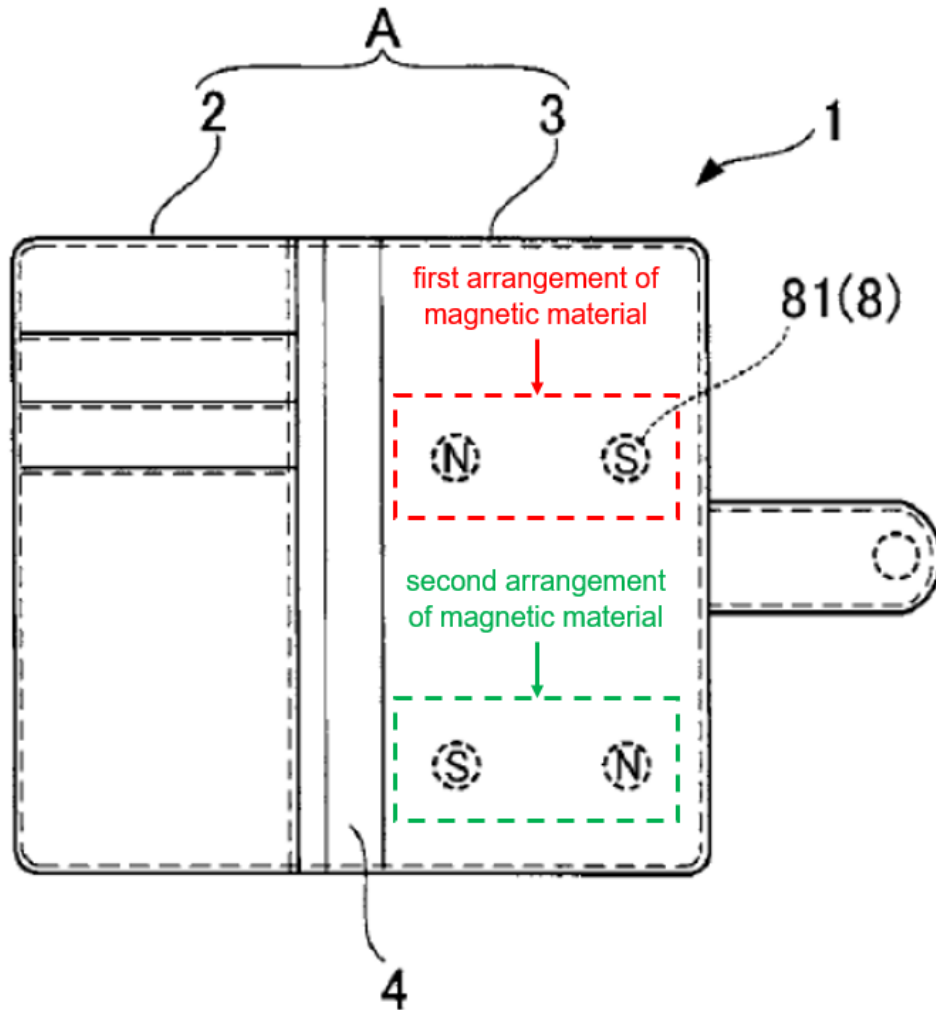
Kinshi renders obvious claim 3. EX1003, ¶413. Kinshi discloses that a mobile phone is “secured in place” when coupled to its folio-style wallet via mutual magnetic attraction. EX1010, ¶¶7, 21. A POSA would have understood and found obvious that the attractive force described in Kinshi is sufficient to support the weight of a mobile device to prevent unintentional detachment from the wallet. EX1003, ¶413.

3. Claim 6

Kinshi discloses claims 6. Section XI.E.4; EX1003, ¶414.

4. Claim 8

Kinshi discloses claim 8. EX1003, ¶¶415-419. Kinshi describes that the four magnets in configuration 81 are disposed clockwise to have alternating north and south magnetic poles, and are disposed in configuration 82 in a corresponding manner. EX1010, ¶26, FIG. 4. A POSA would have understood that such an arrangement of magnets creates an arrangement having 180° rotational symmetry along an axis extending out of the page in Figure 4. EX1003, ¶418. Thus, a POSA would have understood that Kinshi’s configuration of magnets permits coupling between the mobile phone case 1 and the mobile phone Z in exactly two orientations (portrait, right-side up or upside-down). *Id.*



EX1010, FIG. 4 (annotated).

XVIII. 3C: KINSHI-GOTO-COX RENDERS OBVIOUS CLAIM 3

It was obvious to apply Cox’s teachings in paragraphs 51-52 to the Kinshi-Goto wallet such that the magnetic arrangements “are sufficient to support a weight of the mobile device,” as claimed. A POSA would have been motivated and had a reasonable expectation of success based on Cox’s express teachings, as discussed in Section VII; EX1003, ¶¶420-421.

XIX. 3D: KINSHI-GOTO-LAUDER RENDERS OBVIOUS CLAIM 4

It was obvious to space the magnets in the magnetic assemblies of the

Kinshi-Goto wallet “less than 2 mm” based on Lauder’s express teaching that attaching adjacent magnets of opposite polarity would “maintain the integrity of the sequence of magnets in the magnetic assembly.” EX1018, 23:26-30. A POSA would have been motivated and had a reasonable expectation of success based on Lauder’s express teachings, as discussed in Section XIII; EX1003, ¶¶422-424.

XX. 3E: KINSHI-GOTO-HAYMOND RENDERS OBVIOUS CLAIM 9

It was obvious to modify the Kinshi-Goto wallet to include Haymond’s finger strap on the back of Kinshi’s base piece 3 (i.e., “opposite the device side surface”) in order to tether the wallet (and thus the device) to the user’s hand and prevent the user from dropping the wallet. EX1015, 1:18-22; Section XIV; EX1003, ¶¶425-428. A POSA also would have had a reasonable expectation of success because the modification is simple predictable. EX1003, ¶427.

XXI. 3F: KINSHI-GOTO-MITSUYAMA RENDERS OBVIOUS CLAIM 10

It was obvious to modify Kinshi’s pockets to include Mitsuyama’s taper for the reasons discussed above. Section XV; EX1003, ¶¶429-434.

XXII. OBJECTIVE INDICIA

1LSS submitted a declaration from Alejandro Baca during prosecution to support alleged commercial success and praise. EX1002, 241 (1LSS’s arguments), 228-30 (declaration). “[T]o be accorded substantial weight in the obviousness analysis, the evidence of secondary considerations must have a nexus to the claims, *i.e.*, there must be a legally and factually sufficient connection between the

evidence and the patented invention.” *Henny Penny Corp. v. Frymaster LLC*, 938 F.3d 1324, 1332 (Fed. Cir. 2019) (internal quotations omitted). “The patentee bears the burden of showing that a nexus exists.” *WMS Gaming Inc. v. Int’l Game Tech.*, 184 F.3d 1339, 1359 (Fed. Cir. 1999).

1LSS’s prosecution argument fails at least because Mr. Baca’s declaration does not establish a nexus to the claims. Although Mr. Baca described some alleged features of 1LSS’s product, EX1002, 228-29 (¶4), his description does not include key elements such as the magnetic shielding of claims 1 and 5, or the different orientation/geometric pattern of claim 11. EX1003, ¶¶435-436. To the extent 1LSS presents objective indicia during this proceeding, Apple will respond to the evidence when presented.

XXIII. CERTIFICATION UNDER RULE 42.104(A)

Petitioner certifies that the ’641 patent is available for IPR and Petitioner is not barred or estopped from requesting IPR of any claim.

XXIV. MANDATORY NOTICES (37 C.F.R. § 42.8(A)(1))

A. Real Party-in-Interest (37 C.F.R. § 42.8(b)(1)):

The real party-in-interest is Petitioner Apple Inc.

B. Related Matters (37 C.F.R. § 42.8(b)(2))

The ’641 patent is at issue in *1LSS, Inc. v. Apple Inc.*, Civil Action No. 2:24-cv-08769 (C.D. Cal.), filed October 11, 2024.

The ’641 patent claims the benefit of U.S. Patent No. 11,058,194. Pending

U.S. Patent Application No. 17/517,108, filed November 2, 2021, claims the benefit of the '641 patent.

C. Lead and Back-up Counsel (37 C.F.R. § 42.8(b)(3))

Lead Counsel for Petitioner is:

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D. Service Information (37 C.F.R. § 42.8(b)(4))

Please address all correspondence to the lead and back-up counsel as shown above. Petitioner consents to electronic service by e-mail at all of the e-mail addresses listed above and PTAB@sternekessler.com.

XXV. CONCLUSION

The Board should find all claims to be unpatentable.

Respectfully submitted,

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/Richard M. Bemben/

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CERTIFICATE OF WORD COUNT (37 C.F.R. § 42.24(d))

1. This Petition for *Inter Partes* Review complies with the type-volume limitation of 14,000 words, comprising 13,817 words, excluding the parts exempted by 37 C.F.R. § 42.24(a)(1).

2. This Petition for *Inter Partes* Review complies with the general format requirements of 37 C.F.R. § 42.6(a) and has been prepared using Microsoft® Word 2016 in 14-point Times New Roman font.

Respectfully submitted,

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CERTIFICATE OF SERVICE (37 C.F.R. §§ 42.6(e), 42.105(a))

I certify that the above-captioned **PETITION FOR *INTER PARTES***
REVIEW FOR U.S. PATENT NO. 11,864,641 and associated Exhibits 1001-
1035 were served in their entireties upon the Patent Owner on July 24, 2025, via
U.S.P.S. Priority Express Mail at the following address:

THOMAS COESTER LAW CORPORATION DBA TCIP
P.O. Box 5876
Santa Monica, CA 90409
UNITED STATES
*Patent Owner's Correspondence Address of Record
for U.S. Patent No. 11,864,641*

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