

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD**

SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.

Petitioners,

v.

MAXELL, LTD.,
Patent Owner

Case: IPR2025-01308

U.S. Patent No. 11,277,650

**PATENT OWNER'S PRELIMINARY SUR-REPLY IN RESPONSE
TO PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 11,277,650**

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450 Alexandria, VA 22313-1450

PO's positions regarding the claimed "association information" in its POPR and Infringement Contentions ("Inf. Cont.") are consistent. PO is not reversing course in an attempt to avoid any prior art. To the contrary, claims 1 and 4 of the '650 Patent distinguish "device specific ID information" **and** "association information" by reciting them separately in the same claim limitation. Samsung collapses the two different requirements of the claim by pointing to a "device ID" in Shindo and a "device ID" in Futa for all of its grounds. Paper 13, 2-3. This is precisely the flaw in the Petition that PO highlighted in the POPR: simply pointing to a deviceID—a separate requirement of the claim—does not disclose storing of "association information," as required by the claims. Paper 10, 15-19, 33-35, 50-52.

The Reply attempts to rehabilitate the Petition's deficiencies by erecting a strawman regarding PO's alleged inconsistencies. Instead, it only amplifies the Petition's deficiencies by belatedly attempting to set forth a claim construction position arguing that "association information" is not required to be stored in "the storage." Paper 13, 3. Both claims 1 and 4 explicitly recite "a storage storing contents." EX1001, claims 1 and 4. Under 37 C.F.R. § 42.104(b)(3), Samsung was required to clearly articulate "[h]ow the challenged claim is to be construed" and explain how the prior art meets such a construction. The Petition fails to meet §42.104(b)(3) because it is intentionally vague and fails to properly construe and apply the prior art to "association information" and "storing." Samsung's attempt to

overcome these glaring deficiencies by mischaracterization of the Inf. Cont. or advocating for a negative limitation (that “storing” is not in **the** storage identified in the claim) should be rejected.

Contrary to the Petition’s conflation of the two separate claim requirements, the Inf. Cont. identify **both** device ID and association information and are completely consistent with PO’s distinctions from the prior art. Samsung relies on out-of-context snippets from the Inf. Cont., ignoring the explicit evidence PO provides to demonstrate the data fields, metadata, and “GET” request working with “device ID” in the Accused Products to define association information. A comparison of PO’s positions in the POPR and the infringing evidence in the Inf. Cont. shows no inconsistency. Instead, it directly shows device ID **and** association information by way of the use of device ID fields and its metadata for association:

POPR	PO Inf. Cont. (EX1043) at 194–196 (highlights added)
“There is no such association between content and device specific ID defined by trigger information 15, index information, 10, and management information 19.” POPR at 16. “This is . . . different from the	Device Events Device events are structured, lightweight messages that communicate the state of device capabilities to the SmartThings platform and SmartThings clients. When you develop a custom device integration, ensure that your device driver emits a device event when the state of a capability changes (e.g. when a switch turns on), so that clients such as the SmartThings mobile app can refresh the state of the device. Device events should be small and must not be used to track the complete state of a device domain. Device events must not contain extraneous data. Devices should generally not emit more than one event per minute, unless their state has changed as a result of user interaction (such as turning a switch on). SmartThings may adjust device events as necessary to support the SmartThings platform. *** Manage Devices With the Devices API Interact with the Devices API to access devices integrated with the SmartThings platform. The Devices API allows you to control devices connected to the SmartThings platform, access device metadata, and access device states. NOTE You will need a Personal Access Token (PAT) with the appropriate scopes to interact with the Devices API. Example Payload Using Postman This example uses the Postman app to send a GET request to <code>https://api.smartthings.com/v1/devices/<deviceID></code> for a Z-Wave door lock. 1. Begin by creating a new GET request in Postman. 2. Enter the request URL: <code>https://api.smartthings.com/v1/devices/<deviceID></code> where <code><deviceID></code> is the device ID of the device you want to retrieve info for. 3. In the Authorization tab of your GET request in Postman, select Bearer Token as your authorization type. Enter your PAT in the Token field.

claimed ‘association information,’ which must define a specific link between one specific content and one specific subsidiary terminal for the purpose of determining where to transmit that content.”
POPR at 52.

1. Click *Send* in Postman. Below is the payload from the GET request:

```
{
  "deviceId": "3e04c338-d046-446c-b3e9-3edc22bf78ed",
  "name": "Door Lock",
  "label": "Front Door Lock",
  "deviceManufacturerCode": "0038-6341-5044",
  "manufacturerName": "SmartThingsCommunity",
  "deviceModel": "6341-5044",
  "presentationId": "7a15b375-294d-37fc-9ebe-000aea7436c8",
  "locationId": "8a2fa8bd-9e5a-4798-970b-c2ad73671ec9",
  "roomId": "95b1b353-d9e9-4ed0-8c83-a25fd44b93f8",
  "sharedLocations": [],
  "components": [
    {
      "id": "main",
      "label": "Door Lock",
      "capabilities": [
        {
          "id": "lock",
          "version": 1
        },
        {
          "id": "lockCodes",
          "version": 1
        }
      ],
      {
        "id": "battery",
        "version": 1
      }
    ]
  ],
  "createTime": "2022-03-07T22:22:17.726Z",
  "parentDeviceId": "e061df47-ec9b-42f2-beef-81606b87d258",
  "profile": {
    "id": "8d99f587-b7d8-3650-b3be-57e13e17883b"
  },
  "zwave": {
    "networkId": "4D",
    "driverId": "0f206d13-508a-4342-9cbb-937e02489141",
    "executingLocally": true,
    "hubId": "e051df47-ec9b-42f2-beef-81606b87d268",
    "networkSecurityLevel": "ZWAVE_S0_LEGACY",
    "provisioningState": "PROVISIONED"
  },
  "type": "ZWAVE",
  "vid": "7a15b375-294d-37fc-9ebe-000aea7436c8",
  "mnmn": "SmartThingsCommunity",
  "ocfDeviceType": "oic.d.smartlock",
  "restrictionTier": 0,
  "allowed": null
}
```

In the Inf. Cont., the main terminal (*e.g.*, Galaxy S25) issues a “GET” request including as input “deviceId” (*e.g.*, “GET/devices/{deviceId}”) to obtain contents (*i.e.*, device events) from a subsidiary terminal (*e.g.*, fridge). EX1043, 194; *see also id.* at 192. This request returns a data structure including device metadata (*e.g.*, device specific identification (ID)) and device events (*e.g.*, device states). *See id.* at 194–96. Thus, the Inf. Cont. demonstrate how the “deviceId” and its underlying structure corresponds to the claimed **association** information because of the presence of a variety of fields such as “name,” “label,” “device ManufacturerCode,” “locationId,” “parentDeviceId,” “profileID,” “vid,” etc. Thus, the Inf. Cont. do not simply point to “deviceId” but demonstrate how the deviceId works in conjunction with the GET request to provide “association information” that meets claims 1 and 4. Such an association is simply not present in the prior art.

Dated: December 9, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December, 2025, a copy of the attached
PATENT OWNER SUR-REPLY IN RESPONSE TO PETITION FOR *INTER*
PARTES REVIEW OF U.S. PATENT NO. 11,277,650, together with all exhibits
was served by electronic mail to the attorneys of record, at the following addresses:.

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