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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

INGENIOSPEC, LLC,
Patent Owner.

Case No. IPR2026-00143
U.S. Patent No. 12,001,599

PATENT OWNER'S PRELIMINARY RESPONSE

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	OVERVIEW OF THE '599 PATENT	2
III.	LEVEL OF ORDINARY SKILL IN THE ART	2
IV.	CLAIM CONSTRUCTION IS NOT NECESSARY TO DENY INSTITUTION	3
V.	THE PETITION FAILS TO MEET ITS BURDEN ON AT LEAST ONE LIMITATION IN EVERY CLAIM IN ALL GROUNDS	3
A.	Ground 1 Cannot Prevail (Claims 1-7, 10-11, And 24)	5
B.	Ground 2 Cannot Prevail (Claim 8)	6
C.	Ground 3 Cannot Prevail (Claims 9, 12-18, 20, And 25).....	7
D.	Ground 4 Cannot Prevail (Claims 19 And 21-23).....	8
E.	Ground 5 Cannot Prevail (Claims 1-7, 14-15, 20, And 24)	8
F.	Ground 6 Cannot Prevail (Claims 8 And 11)	10
G.	Ground 7 Cannot Prevail (Claims 9-10, 12-18, 20, And 25)	11
H.	Ground 8 Cannot Prevail (Claims 19 And 21-23).....	12
VI.	PETITIONER'S VERBATIM EXPERT DECLARATION SUPPORTS DENYING INSTITUTION	12
VII.	CONCLUSION	15

TABLE OF AUTHORITIES

<i>Ariosa Diagnostics v. Verinata Health</i> , 805 F.3d 1359 (Fed. Cir. 2015)	6, 10
<i>Jiawei Tech. (HK) v. Richmond</i> , IPR2014-00937, Paper 24 (P.T.A.B. Feb. 6, 2015)	4
<i>Johnson & Johnson Surgical Vision v. Alcon</i> , IPR2021-01003, Paper 14 (P.T.A.B. Nov. 23, 2021).....	2
<i>In re Magnum Oil Tools Int’l</i> , 829 F.3d 1364 (Fed. Cir. 2016)	4, 6, 9
<i>Realtime Data v. Iancu</i> , 912 F.3d 1368 (Fed. Cir. 2019).....	3
<i>Securus Techs. v. Global Tel*Link Corp.</i> , IPR2016-00267, Paper 10 (P.T.A.B. Sept. 12, 2016)	4
<i>TikTok v. NTECH Props.</i> , IPR2024-01339, Paper 9 (P.T.A.B. Feb. 25, 2025)	13
<i>Ubiquiti v. Intellectual Ventures</i> , IPR2024-01290, Paper 9 (P.T.A.B. Mar. 7, 2025)	<i>passim</i>
<i>Unified Patents v. SMTM Techs.</i> , IPR2019-00434, Paper 6 (P.T.A.B. July 30, 2019).....	4
<i>Xerox v. Bytemark</i> , IPR2022-00624, Paper 9 (P.T.A.B. Aug. 24, 2022).....	12, 13

OTHER AUTHORITIES

37 C.F.R. § 42.104	3, 6, 10
35 U.S.C. § 314.....	1, 4

TABLE OF EXHIBITS

Exhibit No.	Description
2001	Complaint, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867, Dkt. No. 1 (W.D. Tex. June 5, 2025)
2002	Complaint, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00877, Dkt. No. 1 (W.D. Tex. June 6, 2025)
2003	Order Granting Joint Motion to Consolidate, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867, Dkt. No. 25 (W.D. Tex. Oct. 14, 2025)
2004	Scheduling Order, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867, Dkt. No. 36 (W.D. Tex. Nov. 17, 2025)
2005	Scheduling Order, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867, Dkt. No. 39 (W.D. Tex. Dec. 5, 2025)
2006	Defendant Apple Inc.’s Preliminary Invalidity Contentions, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867 (W.D. Tex. Nov. 21, 2025) (cover pleading)
2007	RESERVED
2008	RESERVED
2009	RESERVED
2010	Exhibit E-3 to Defendant Apple Inc.’s Preliminary Invalidity Contentions, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867 (W.D. Tex. Nov. 21, 2025)
2011	Defendant’s Proposed Claim Constructions, <i>IngenioSpec, LLC v. Apple Inc.</i> , Case No. 1:25-cv-00867 (W.D. Tex. Dec. 22, 2025)
2012	DocketNavigator Case List for U.S. Patent No. 11,829,518
2013	Office Action in Apple Patent Application Citing U.S. Patent No. 7,890,128
2014	Information Disclosure Statement in Apple Patent Application Listing U.S. Patent Application Publication No. 2004/0208324
2015	Declaration of Peter Tong

I. INTRODUCTION

IngenioSpec is a California company that has led innovation in wearable electronic devices for more than a decade. EX2002 ¶¶ 3-4. Its cutting-edge wearable technology seamlessly integrates electronics into the wearable devices to deliver practical solutions that positively transform consumers’ daily lives. *Id.* ¶ 4. Through its patented wearable device technologies, these solutions include health monitoring, hands-free communication, enhanced hearing, and integrated audio and video playback. *Id.* ¶¶ 5, 7-8.

Despite its Petition spanning eight grounds based on a collage of five asserted references to target twenty-five patent claims, Apple has not met its burden to establish a reasonable likelihood of prevailing on any patent claim. Across all asserted grounds, the Petition fatally omits addressing at least one limitation in every challenged claim. The Petition offers no analysis whether, much less how, the asserted art taught the requirement of “at least partially in the wireless wearable device” or comparable claim limitations present in every claim. Having omitted a necessary element of the challenged claims from its analysis, the Petition falls well short of meeting the threshold showing required by 35 U.S.C. § 314(a), and institution should be denied.

II. OVERVIEW OF THE '599 PATENT

The '599 Patent is titled “Head-Worn Device with Connection Region.” EX1001 at 1. The '599 Patent describes a wireless wearable device with one or more embedded or partially embedded electrical components which make the device easier to operate and improve wireless communication techniques for users of mobile communication devices. *Id.* at 3:60-4:3. Among other electronic components in the wearable wireless device, the '599 Patent describes, for example, speakers, an electrical connector, a rechargeable battery, a microphone, and wireless communication circuitry. *E.g., id.* at 4:31-39.

III. LEVEL OF ORDINARY SKILL IN THE ART

For purposes of denying institution and finding that Apple has not met its burden to show a reasonable likelihood of prevailing, IngenioSpec submits that the Board need not determine the level of ordinary skill in the art. *Johnson & Johnson Surgical Vision v. Alcon*, IPR2021-01003, Paper 14 at 9 (P.T.A.B. Nov. 23, 2021) (denying institution: “For our analysis on whether to institute, we need not determine the level of ordinary skill in the art”).

IngenioSpec reserves the right to address the level of ordinary skill in the event the Board institutes trial.

IV. CLAIM CONSTRUCTION IS NOT NECESSARY TO DENY INSTITUTION

Apple asserts in the Petition that “no claim construction is necessary to resolve any issue” in this proceeding. Paper 2 (“Pet.”) at 6. For purposes of denying institution because Apple has not met its burden to show a reasonable likelihood of prevailing, IngenioSpec submits the Board need not construe any terms of the challenged claims. *Realtime Data v. Iancu*, 912 F.3d 1368, 1375 (Fed. Cir. 2019) (“The Board is required to construe ‘only those terms... that are in controversy, and only to the extent necessary to resolve the controversy.’” (quoting *Vivid Techs. v. Am. Sci. & Eng’g*, 200 F.3d 795, 803 (Fed. Cir. 1999))).

IngenioSpec reserves the right to assert claim construction positions if trial is ordered.

V. THE PETITION FAILS TO MEET ITS BURDEN ON AT LEAST ONE LIMITATION IN EVERY CLAIM IN ALL GROUNDS

The Petition does not address at least one limitation in every challenged claim in each of the Petition’s eight grounds and thus on its face fails to “specify where each element of the claim is found in the prior art patents or printed publications relied upon,” as required by 37 C.F.R. § 42.104(b)(4). As explained below, the Petition does not address the requirement of “at least partially in the wireless wearable device” or comparable claim limitations, including limitations in all independent Claims 1, 20, 22, and 24 as well as several dependent claims.

IPR may not be instituted “unless... the information presented in the petition... shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged in the petition.” 35 U.S.C. § 314(a). In addition, the Board’s “determination regarding institution” must be “based on what the Petition actually presented and not what it could have reasonably contained had it been reformulated.” *Securus Techs. v. Global Tel*Link Corp.*, IPR2016-00267, Paper 10 at 5 (P.T.A.B. Sept. 12, 2016); *see also In re Magnum Oil Tools Int’l*, 829 F.3d 1364, 1381 (Fed. Cir. 2016) (Board is not “free to adopt arguments on behalf of petitioners that could have been, but were not, raised by the petitioner during an IPR”).

Here, because the Petition fails to meet its burden on at least one limitation required by all claims, Apple cannot sustain its burden on any claim, and institution should be denied. *See, e.g., Unified Patents v. SMTM Techs.*, IPR2019-00434, Paper 6 at 19 (P.T.A.B. July 30, 2019) (no reasonable likelihood of success where “Petitioner entirely fails to address [claim] limitation”); *see also Jiawei Tech. (HK) v. Richmond*, IPR2014-00937, Paper 24 at 5 (P.T.A.B. Feb. 6, 2015) (denying request for rehearing regarding denial of institution: “Petitioner’s complaints about our analysis do not undo Petitioner’s failure to address the claim language in the Petition.”).

A. Ground 1 Cannot Prevail (Claims 1-7, 10-11, And 24)

Ground 1 cannot prevail because the Petition does not address the limitation “at least partially in the wireless wearable device” required by challenged Claims 1-7, 10-11, and 24, much less show that it is satisfied. Because the Petition simply fails to address this limitation at all in the cited instances below and because Apple cannot remedy that failure in reply, Apple cannot carry its burden to show invalidity of any challenged claim.

For example, as to Claim 1, the Petition never addresses the Claim 1[B] requirement of an electrical connector “at least partially in the wireless wearable device,” *see* Pet. at 18-21, or the Claim 1[E] requirement of a microphone “at least partially in the wireless wearable device,” *see* Pet. at 30. Similarly, as to independent Claim 24, the Petition never addresses the Claims 24[A], 24[D], 24[E], and 24[F] requirements of an electrical connector, a speaker, a first microphone, and a second microphone, respectively, that are “at least partially in the wireless wearable device.” *See* Pet. at 39-42.

The Petition also never addresses the “at least partially in the wireless wearable device” requirement in several dependent claims, including in Claims 3[A], 6[A], 7[A], and 10[A]. *See* Pet. at 32, 34-37.

Apple’s failure to address these claim limitations at all cannot be remedied after institution. The Board cannot “adopt arguments on behalf of petitioners that

could have been, but were not, raised by the petitioner during an IPR.” *Magnum Oil Tools*, 829 F.3d at 1381. Nor can Apple make a new “meaningfully distinct contention” in reply to fill in gaps in its Petition or exceed the proper scope of reply. *See* 37 C.F.R. §§ 42.23(b), 42.104(b)(4); *Ariosa Diagnostics v. Verinata Health*, 805 F.3d 1359, 1367-68 (Fed. Cir. 2015) (“The Board must make judgments about whether a Petition identified the specific evidence relied on in a Reply and when a Reply contention crosses the line from the responsive to the new.”).

Because the Petition does not address at least one limitation in every claim challenged, Ground 1 fails, and Apple cannot prevail on Ground 1.

B. Ground 2 Cannot Prevail (Claim 8)

The Ground 2 challenge to Claim 8 falls with the Ground 1 challenges to Claims 1 and 2 from which Claim 8 depends. As explained, Ground 1 fails. *Supra* § V.A. Thus, Ground 2 also fails. *Ubiquiti v. Intellectual Ventures*, IPR2024-01290, Paper 9 at 32 (P.T.A.B. Mar. 7, 2025) (“Because each of the dependent claims incorporates the limitations of the independent claim from which it depends, Petitioner has also necessarily failed to demonstrate a reasonable likelihood that these claims are unpatentable over the prior art.”).

Ground 2 also independently fails because the Petition fails to address the Claim 8[B] requirement of a storage medium “at least partially in the wireless wearable device.” *See* Pet. at 45-47.

Apple cannot prevail on Ground 2.

C. Ground 3 Cannot Prevail (Claims 9, 12-18, 20, And 25)

The Ground 3 challenges to dependent Claims 9, 12-18, and 25 fall with the Ground 1 challenges to claims from which they depend. As explained, Ground 1 fails. *Supra* § V.A. Thus, the Ground 3 challenges to Claims 9, 12-18, and 25 also fail. *Ubiquiti*, IPR2024-01290, Paper 9 at 32 (petitioner necessarily fails to show unpatentability of dependent claims by failing to show unpatentability of independent claim from which they depend).

The Ground 3 challenges to Claims 9, 14-18, and 20 also independently fail because the Petition fails to address the Claims 9[A], 14[A], 15[A], 16[A]¹, 17[A], 18[A], 20[B], 20[E], 20[G], and 20[H] requirements of “at least partially in the wireless wearable device.” *See* Pet. at 51-52, 58-63. For example, as to independent Claim 20, the Petition never addresses the 20[B], 20[E], 20[G], and 20[H] requirements of an electrical connector, a microphone, a storage medium, and wireless communication circuitry, respectively, that are “at least partially in the wireless wearable device.” *See* Pet. at 61-63.

Apple cannot prevail on Ground 3.

¹ Claim 16[A] refers to “claim 9[B]” for its entire argument, but claim 9[B] does not exist. *See* Pet. at 51-55, 60.

D. Ground 4 Cannot Prevail (Claims 19 And 21-23)

The Ground 4 challenges to dependent Claims 19 and 21 fall with the Grounds 1 and 3 challenges to claims from which they depend. As explained, Grounds 1 and 3 fail. *Supra* §§ V.A., V.C. Thus, the Ground 4 challenges to Claims 19 and 21 also fail. *Ubiquiti*, IPR2024-01290, Paper 9 at 32 (petitioner necessarily fails to show unpatentability of dependent claims by failing to show unpatentability of independent claim from which they depend).

The Ground 4 challenges to Claims 22 and 23 independently fail because the Petition fails to address the Claims 22[B], 22[E], 22[G], 23[A], and 23[B] requirements of “at least partially in the wireless wearable device.” *See* Pet. at 65-67. For example, as to independent Claim 22, the Petition never addresses the Claims 22[B], 22[E], and 22[G] requirements of an electrical connector, a microphone, and wireless communication circuitry, respectively, that are “at least partially in the wireless wearable device.” *See* Pet. at 65-66.

Apple cannot prevail on Ground 4.

E. Ground 5 Cannot Prevail (Claims 1-7, 14-15, 20, And 24)

Ground 5 cannot prevail because the Petition does not address the limitation “at least partially in the wireless wearable device” required by challenged Claims 1-7, 14-15, 20, and 24, much less show that it is satisfied.

For example, as to Claim 1, the Petition never addresses the Claims 1[B], 1[D], and 1[E] requirements of an electrical connector, a rechargeable battery, and a microphone, respectively, that are “at least partially in the wireless wearable device.” *See* Pet. at 72-73, 75-76. Similarly, as to independent Claim 24, the Petition never addresses the Claims 24[A], 24[D], 24[E], and 24[F] requirements of an electrical connector, a speaker, a first microphone, and a second microphone, respectively, that are “at least partially in the wireless wearable device,” *see* Pet. at 82-84, or the Claim 24[C] requirement of a rechargeable battery “in the wireless wearable device,” *see* Pet. at 82.

The Petition also never addresses the “at least partially in the wireless wearable device” requirement in several dependent claims, including in Claims 2[A], 3[A], 6[A], and 7[A]. *See* Pet. at 76-78, 80-82.

Finally, Claims 14-15 and 20 are not addressed in the Petition’s Ground 5 even though the Petition’s heading says it challenges them. *See* Pet. at 68, 81-82. Accordingly, to the extent the Petition had intended to challenge Claims 14-15 and 20 in Ground 5, those challenges fail.

As noted above, Apple’s failure to address these claim limitations at all cannot be remedied after institution. The Board cannot “adopt arguments on behalf of petitioners that could have been, but were not, raised by the petitioner during an IPR.” *Magnum Oil Tools*, 829 F.3d at 1381. Nor can Apple make a new

“meaningfully distinct contention” in reply to fill in gaps in its Petition or exceed the proper scope of reply. *See* 37 C.F.R. §§ 42.23(b), 42.104(b)(4); *Ariosa Diagnostics*, 805 F.3d at 1367-68 (“The Board must make judgments about whether a Petition identified the specific evidence relied on in a Reply and when a Reply contention crosses the line from the responsive to the new.”).

Because the Petition does not address at least one limitation in every claim challenged, Apple cannot prevail on Ground 5.

F. Ground 6 Cannot Prevail (Claims 8 And 11)

The Ground 6 challenge to dependent Claims 8 and 11 fall with the Ground 5 challenges to Claims 1 and 2 from which Claims 8 and 11 depend. As explained, Ground 5 fails. *Supra* § V.E. Thus, Ground 6 also fails. *Ubiquiti*, IPR2024-01290, Paper 9 at 32 (petitioner necessarily fails to show unpatentability of dependent claims by failing to show unpatentability of independent claim from which they depend).

The Ground 6 challenge to Claim 8 also independently fails because the Petition fails to address the Claim 8[B] requirement of a storage medium “at least partially in the wireless wearable device.” *See* Pet. at 87-88.

Apple cannot prevail on Ground 6.

G. Ground 7 Cannot Prevail (Claims 9-10, 12-18, 20, And 25)

The Ground 7 challenges to dependent Claims 9-10, 12-18, and 25 fall with the Ground 5 challenges to claims from which they depend. As explained, Ground 5 fails. *Supra* § V.E. Thus, the Ground 7 challenges to Claims 9-10, 12-18, and 25 also fail. *Ubiquiti*, IPR2024-01290, Paper 9 at 32 (petitioner necessarily fails to show unpatentability of dependent claims by failing to show unpatentability of independent claim from which they depend).

The Ground 7 challenges to Claims 9-10, 14-18, and 20 also independently fail because the Petition fails to address the Claims 9[A], 10[A], 14[A], 15[A], 16[A]², 17[A], 18[A], 20[B], 20[D], 20[E], 20[F], 20[G], and 20[H] requirements of “at least partially in the wireless wearable device.” *See* Pet. at 90-96. For example, as to independent Claim 20, the Petition never addresses the 20[B], 20[D], 20[E], 20[F], 20[G], and 20[H] requirements of an electrical connector, a rechargeable battery, a microphone, another microphone, a storage medium, and wireless communication circuitry, respectively, that are “at least partially in the wireless wearable device.” *See* Pet. at 95-96.

Apple cannot prevail on Ground 7.

² Claim 16[A] refers to “claim 9[B]” for its entire argument, but claim 9[B] does not exist. *See* Pet. at 90-92, 94.

H. Ground 8 Cannot Prevail (Claims 19 And 21-23)

The Ground 8 challenges to dependent Claims 19 and 21 fall with the Grounds 5 and 7 challenges to claims from which they depend. As explained, Grounds 5 and 7 fail. *Supra* §§ V.E, V.G. Thus, the Ground 8 challenges to Claims 19 and 21 also fail. *Ubiquiti*, IPR2024-01290, Paper 9 at 32 (petitioner necessarily fails to show unpatentability of dependent claims by failing to show unpatentability of independent claim from which they depend).

The Ground 8 challenges to Claims 22 and 23 independently fail because the Petition fails to address the Claims 22[B], 22[D], 22[E], 22[F], 22[G], 23[A], and 23[B] requirements of “at least partially in the wireless wearable device.” *See* Pet. at 97-98. For example, as to independent Claim 22, the Petition never addresses the Claims 22[B], 22[D], 22[E], 22[F], and 22[G] requirements of an electrical connector, a rechargeable battery, a microphone, another microphone, and wireless communication circuitry, respectively, that are “at least partially in the wireless wearable device.” *See* Pet. at 97-98.

Apple cannot prevail on Ground 8.

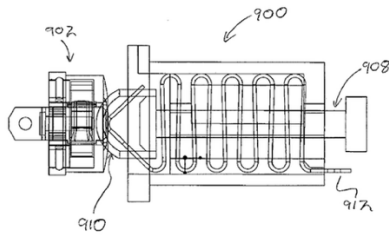
VI. PETITIONER’S VERBATIM EXPERT DECLARATION SUPPORTS DENYING INSTITUTION

The Petition is supported by an expert declaration that “merely repeats, *verbatim*, the conclusory assertion[s] for which it is offered to support.” *Xerox v.*

Bytemark, IPR2022-00624, Paper 9 at 15 (P.T.A.B. Aug. 24, 2022) (precedential) (denying institution). With respect to the Petition’s failure to address at least one limitation in every claim as discussed in Section V above, even if Apple could rely on its expert declaration for arguments not made in the Petition (it cannot), Apple’s expert, Dr. Smith, simply repeats word for word the text of the Petition and thus fails to remedy any of the deficiencies identified above. *Compare* Pet. at 8-98, *with* EX1003 ¶¶ 32-260.

Dr. Smith’s parroting verbatim Apple’s Petition, as shown in the illustrative snapshot below, confirms the Petition’s weakness and supports denying institution. *See, e.g., Xerox*, IPR2022-00624, Paper 9 at 15-17 (declining to institute IPR where expert declaration “merely repeats, *verbatim*, the conclusory assertion for which it is offered to support”); *TikTok v. NTECH Props.*, IPR2024-01339, Paper 9 at 16 (P.T.A.B. Feb. 25, 2025) (“Petitioner fails to establish a reasonable likelihood of” prevailing where its expert “testimony repeats, almost verbatim, the language in the Petition without any further explanation or supporting reasoning or evidence.”).

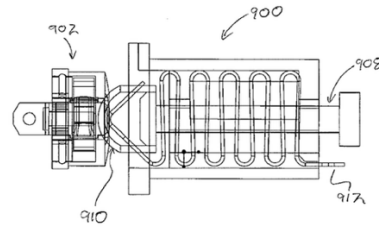
<p>Pet. at 21-24 Ground 1, Claim 1[C] (excerpted)</p>	<p>Smith Decl. ¶¶ 49-53 Ground 1, Claim 1[C] (excerpted)</p>
<p>This element is met by Jannard in view of Burson. (EX1003, ¶49.) For example, Jannard discloses that “with an appropriate recharging cradle (not shown), the audio device 10D can be laid on the cradle, thereby making contact between the power contacts 164 and corresponding contacts in the cradle (not shown).” (EX1016, 33:16-20; EX1003, ¶49.)</p> <p>To the extent that Jannard alone does not teach the conductive areas coupling to corresponding conductive contacts, at least via spring-force, this element is taught by Jannard in combination with Burson. (EX1003, ¶50.) For example, as described above, Jannard discloses that power contacts on a wireless, wearable headset (Jannard’s audio device, <i>see</i> EX1016 at 38:62-39:1) can removably connect to corresponding contacts on a cradle to recharge the headset’s battery. (EX1003, ¶50.) Burson similarly discloses a wireless, wearable headset that utilizes a cradle to recharge its battery. (EX1003, ¶50.) In Burson, positive and negative surface charging contacts (which may be integrated with the headset) removably couple the device’s battery to corresponding charging contacts on a powered charging base. (EX1020, 2:5-53, 3:31-4:55, 8:54-57; EX1003, ¶50.) When the device is inserted into a docking cradle of the charging base, charging current is supplied through the coupled contacts to recharge the device’s battery. (EX1020, 1:26-42, 6:56-67; EX1003, ¶50.)</p> <p>Burson discloses that the charging base’s surface contacts can advantageously be spring-loaded, thus allowing the user to “simply drop the headset into [the] cradle without fumbling with a plug.” (EX1020, 1:43-59; EX1003, ¶51.) As the headset in Burson is inserted into the cradle, <i>e.g.</i>, via a downward and forward motion, the headset’s charging contacts exert pressure on the charging base’s corresponding spring-loaded contacts, causing the spring-loaded contacts to retract. (EX1020, 6:56-67; EX1003, ¶51.) Once the headset is fully inserted, the spring-loaded contacts “form an electrical connection” with the headset’s contacts. (EX1020, 6:56-67; EX1003, ¶51.) That is, once the headset’s contacts become aligned with the charging base’s contacts in a detent position, an actuator of the spring-loaded contact extends into the headset contact apparatus 902, “allowing the spring loaded contacts to couple with the corresponding contacts on the headset contact apparatus 902 to complete the charging loop.” (EX1020, 9:7-26; EX1003, ¶51.) Conversely, the electrical connection is discontinued when the headset is removed from the cradle. (EX1020, 9:27-37; EX1003, ¶51.) FIG. 9 illustrates an electrical coupling of headset contact apparatus 902 in the detent position with the corresponding spring-loaded contact 900, via actuator 910 and spring 912:</p>	<p>49. This element is met by Jannard in view of Burson. For example, Jannard discloses that “with an appropriate recharging cradle (not shown), the audio device 10D can be laid on the cradle, thereby making contact between the power contacts 164 and corresponding contacts in the cradle (not shown).” (EX1016, 33:16-20.)</p> <p>50. To the extent that Jannard alone does not teach the conductive areas coupling to corresponding conductive contacts, at least via spring-force, this element is taught by Jannard in combination with Burson. For example, as described above, Jannard discloses that power contacts on a wireless, wearable headset (Jannard’s audio device, <i>see</i> EX1016 at 38:62-39:1) can removably connect to corresponding contacts on a cradle to recharge the headset’s battery. Burson similarly discloses a wireless, wearable headset that utilizes a cradle to recharge its battery. In Burson, positive and negative surface charging contacts (which may be integrated with the headset) removably couple the device’s battery to corresponding charging contacts on a powered charging base. (EX1020, 2:5-53, 3:31-4:55, 8:54-57.) When the device is inserted into a docking cradle of the charging base, charging current is supplied through the coupled contacts to recharge the device’s battery. (EX1020, 1:26-42, 6:56-67.)</p> <p>51. Burson discloses that the charging base’s surface contacts can advantageously be spring-loaded, thus allowing the user to “simply drop the headset into [the] cradle without fumbling with a plug.” (EX1020, 1:43-59.) As the headset in Burson is inserted into the cradle, <i>e.g.</i>, via a downward and forward motion, the headset’s charging contacts exert pressure on the charging base’s corresponding spring-loaded contacts, causing the spring-loaded contacts to retract. (EX1020, 6:56-67.) Once the headset is fully inserted, the spring-loaded contacts “form an electrical connection” with the headset’s contacts. (EX1020, 6:56-67.) That is, once the headset’s contacts become aligned with the charging base’s contacts in a detent position, an actuator of the spring-loaded contact extends into the headset contact apparatus 902, “allowing the spring loaded contacts to couple with the corresponding contacts on the headset contact apparatus 902 to complete the charging loop.” (EX1020, 9:7-26.) Conversely, the electrical connection is discontinued when the headset is removed from the cradle. (EX1020, 9:27-37.) FIG. 9 illustrates an electrical coupling of headset contact apparatus 902 in the detent position with the corresponding spring-loaded contact 900, via actuator 910 and spring 912:</p>



(EX1020, 9:7-26; EX1003, ¶51.)

Burson provides that in the detent position, pressure is applied by the actuator member against the headset contact to “complete the charging loop” and permit the electrical coupling. (EX1020, 9:7-26; EX1003, ¶52.) The POSITA would understand this pressure to be the result of a spring-force applied by spring 912: as the POSITA would recognize, when a spring (such as spring 912) is coupled to a mass (such as actuator 910) and compressed (*e.g.* by the downward and forward motion of the headset against the cradle), the spring—by the operation of Hooke’s law—exerts a restorative spring force on the mass. (*See* EX1021, 132-33; EX1003, ¶52.) Thus, the POSITA would understand spring 912 to exert a spring force on the actuator toward the headset contact 902 when the headset is docked, thereby “allowing the spring loaded contacts to couple with the corresponding contacts on the headset contact apparatus 902 to complete the charging loop.” (EX1020, 9:7-26; EX1003, ¶52.)

Applying Burson’s teachings to Jannard, the electrical contacts of Jannard’s docking cradle would be spring-loaded, as in Burson, to removably couple to (and separate from) the corresponding power contacts 164 of Jannard’s headset. (EX1003, ¶53.) The inclusion of the spring-loaded contacts would simplify charging by allowing a user to “simply drop the headset into [the] cradle without fumbling with a plug.” (EX1020, 1:43-59; EX1003, ¶53.) As described above for Burson, the spring-loaded contacts of the docking cradle would utilize spring-force to enable the docking cradle’s contacts to electrically connect to the corresponding power contacts 164 when Jannard’s headset is inserted into the charging cradle. (EX1003, ¶53.) This electrical connection between power contacts 164 and the charger’s corresponding contacts enables charging the battery of Jannard’s headset, as described above for Jannard. (EX1016, 33:13-15; EX1003, ¶53.)



(EX1020, 9:7-26.)

52. Burson provides that in the detent position, pressure is applied by the actuator member against the headset contact to “complete the charging loop” and permit the electrical coupling. (EX1020, 9:7-26.) The POSITA would understand this pressure to be the result of a spring-force applied by spring 912: as the POSITA would recognize, when a spring (such as spring 912) is coupled to a mass (such as actuator 910) and compressed (*e.g.* by the downward and forward motion of the headset against the cradle), the spring—by the operation of Hooke’s law—exerts a restorative spring force on the mass. (*See* EX1021, 132-33.) Thus, the POSITA would understand spring 912 to exert a spring force on the actuator toward the headset contact 902 when the headset is docked, thereby “allowing the spring loaded contacts to couple with the corresponding contacts on the headset contact apparatus 902 to complete the charging loop.” (EX1020, 9:7-26.)

53. Applying Burson’s teachings to Jannard, the electrical contacts of Jannard’s docking cradle would be spring-loaded, as in Burson, to removably couple to (and separate from) the corresponding power contacts 164 of Jannard’s headset. The inclusion of the spring-loaded contacts would simplify charging by allowing a user to “simply drop the headset into [the] cradle without fumbling with a plug.” (EX1020, 1:43-59.) As described above for Burson, the spring-loaded contacts of the docking cradle would utilize spring-force to enable the docking cradle’s contacts to electrically connect to the corresponding power contacts 164 when Jannard’s headset is inserted into the charging cradle. This electrical connection between power contacts 164 and the charger’s corresponding contacts enables charging the battery of Jannard’s headset, as described above for Jannard. (EX1016, 33:13-15.)

VII. CONCLUSION

For any of these reasons, the Board should deny institution of the Petition.

Apple Inc. v. IngenioSpec, LLC
U.S. Patent No. 12,001,599 – IPR2026-00143

ARMOND WILSON LLP

Dated: March 3, 2026

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CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. § 42.24(d), the undersigned certifies that foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** exclusive of the parts exempted as provided in 37 C.F.R. § 42.24, contains 2,822 words and therefore complies with the type-volume limitations of 37 C.F.R. § 42.24.

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CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a true copy of the foregoing **PATENT OWNER'S PRELIMINARY RESPONSE** is being served electronically on March 3, 2026 to the following lead and backup counsel for Petitioner to the following email addresses:

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