

**Patent Owner's Opposition to  
Petition for *Inter Partes* Review  
U.S. Patent 6,575,717**

IRP2012-00026

IPR2013-00109

Hearing Date: November 18, 2013

# Grounds of Review

- Anticipation by *Perlman* of claims 1, 3 and 22
- Anticipation by *Yohe* of claims 1, 3, 6, 7, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100
- Obviousness over the combination of *Perlman* and *Yohe* of claims 1, 3, 10 and 22-24
- Anticipation by *Santos* of claims 1, 3 and 22-24
- Anticipation by *DRP* of claims 6, 7, 9, 11, 12 and 14
- Obviousness over the combination of *Mattis* and *DRP* of original claims 6, 7, 9, 11, 12 and 14

# Petition's Cited Art

- **Perlman** – a synchronization mechanism
- **Yohe** – a file oriented caching system
- **Santos** – intermediate compressor/decompressor
- **DRP** – an index protocol
- **Mattis** – a file storage method

# Construction of Claim Terms

## 1. Data Access

- Obtaining data on a remote computer network in response to a request from the client.

Many known applications and protocols provide means for caching and verifying of data transmitted via a network 2 (FIG. 1, prior art). Thus, a client (receiver) 4 caches data received from network 2 in cache 6. Then, when data from a remote server (sender) 8 is requested, it first searches its local cache. If the requested data is available in the cache and is verified to be valid, the client uses it, and transmission over the network is not required. Gateway or proxy caches 10 (FIG. 2, prior art) are able to operate in a similar manner.

Ex.1002 at 1:18-26

computer completes the transaction. This transaction begins with a receiver/computer sending a request to the sender/computer.

Ex.1002 at 7:65-67

# Construction of Claim Terms

## 2. Permanent Storage Memory

- Non-volatile memory that allows reading and writing of data.

An example of a first memory could be a RAM; an example of a permanent storage memory may be a disk drive, a flash RAM or a bubble memory.

Ex.1002 at 7:38-40

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