Petitioners Dell, H-P, and NetApp

IPR2013-00635 U.S. Patent No. 6,978,346

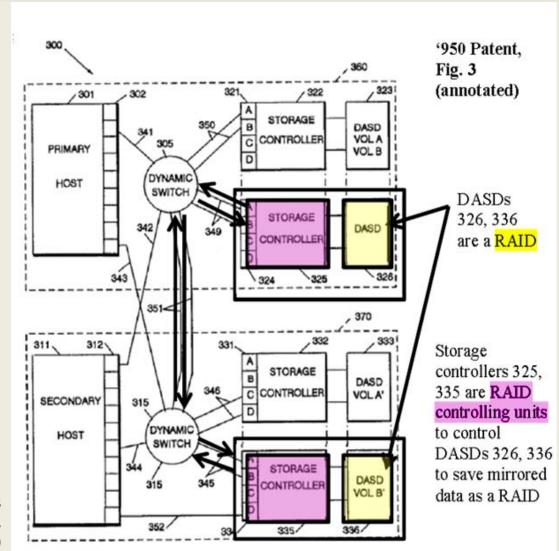
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'346 Patent, Claim 1

- An apparatus for a redundant interconnection between multiple hosts and a RAID, comprising:
 - a first RAID controlling units and a second RAID controlling unit for processing a requirement of numerous host computers, the first RAID controlling unit including a first network controlling unit and a second network controlling unit, and the second RAID controlling unit including a third network controlling unit and a fourth network controlling unit; and
 - a plurality of connection units for connecting the first RAID controlling units and the second RAID controlling unit to the numerous host computers, wherein the first RAID controlling unit and the second RAID controlling unit directly exchange information with the numerous host computers through the plurality of connecting units, and the first network controlling unit exchanges information with the fourth network controlling unit, and the second network controlling unit exchanges information with the third network controlling unit.

DHPN-1001, '346 Patent, claim 1 (Discussed *inter alia* in Petition, paper no. 1 at 45-53)

Hathorn discloses a RAID and RAID controlling units



DHPN-1012, Second Mercer Decl. at p.13 (Discussed at Petitioner's Reply, paper no. 33 at pp.3-4)

Competing constructions of "RAID"

"RAID" is well understood by a person of ordinary skill in the art as an acronym for "redundant array of inexpensive disks." Ex. 1001, Abstract. We are not persuaded that any additional restrictions are needed to capture the ordinary meaning of RAID. Thus, we construe "RAID" to mean "redundant array of inexpensive disks."

Paper 19, Institution Decision at p.8 (Discussed at Petitioner's reply, paper no. 33 at p.2)

In summary, taking into account the underlying meaning of the terms in the acronym, "RAID" should be understood to mean "a single logical unit for mass storage that provides fault tolerance and recovery via employing multiple physical disk drives." (Conte Decl. ¶ 38.)

Paper 27, PO Response at p.12

A RAID is not limited to a "single logical unit"

RAID

RAID is an acronym for redundant array of inexpensive disks. A RAID device consists of a group of disks that can be configured in many ways, either as a single unit or in various combinations of striped and mirrored configurations. The types of configuration available are called RAID levels:

DHPN-1003 (Weygant) at p.153 (Discussed at Petitioner's reply, paper no. 33 at p.7)

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