IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BLACKBERRY CORP., Petitioner,

v.

CYPRESS SEMICONDUCTOR CORP., Patent Owner.

> Case IPR2014-Patent U.S. 6,012,103

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 14-16, 18-20, AND 23-27 OF U.S. PATENT NO. 6,012,103 UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104

Mail Stop PATENT BOARD Patent Trial and Appeal Board US Patent and Trademark Office PO Box 1450 Alexandria, Virginia 22313-1450

DOCKET

ALARM

Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

TABLE OF CONTENTS

I.	MANDATORY NOTICES1			
II.	CERTIFICATION OF GROUNDS FOR STANDING			
III.	OVERVIEW OF CHALLENGE AND RELIEF REQUESTED			
	A.	Prior Art Patents and Printed Publications	3	
	B.	Grounds for Challenge	4	
IV.	OVERVIEW OF THE '103 PATENT			
V.	CLA	12		
	A.	Claims 14, 16, 19, and 20: "configuration information"	12	
	B.	Claim 14[c]: "electronically simulating a physical disconnection and reconnection of the peripheral device"	12	
	C.	Claim 24[a]: "means for physically connecting a peripheral device to a computer system through the computer peripheral bus"	14	
	D.	Claim 24[b]: "means for receiving a second set of configuration information from a computer system over the computer peripheral bus and port"	14	
	E.	Claim 24[c]: "means for electronically simulating a physical disconnection and reconnection of the peripheral device to reconfigure the peripheral device to a second configuration based on the second set of configuration information"	15	
		information"		
VI.	LEVEL OF ORDINARY SKILL IN THE ART15			
VII.	IDENTIFICATION OF HOW THE CHALLENGED CLAIMS ARE UNPATENTABLE			
	A.	Admitted Prior Art	16	

	В.	Claims 14, 18–20, and 23–27 of the '103 Patent Are	10
		Obvious under 35 U.S.C. §103(a) over APA and Yap	19
	C.	Claims 15 and 16 of the '103 Patent Are Obvious under	0-
		35 U.S.C. 103(a) over the APA, Yap, and Michelson	37
	D.	Claims 14–16, 18, and 23–26 of the '103 Patent Are	
		Obvious under 35 U.S.C. § 103 over Michelson,	
		PCCextend, and Davis	40
	E.	Claims 19, 20, and 27 of the '103 Patent Are Obvious	
		under 35 U.S.C. § 103 over Michelson, PCCextend,	
		Davis, and the APA	55
	F.	Claim 14 of the '103 Patent Is Anticipated Under 35	
		U.S.C. § 102(b) Over the USB Spec.	59
VIII.	CON	CLUSION	60

EXHIBIT LIST

- 1001 U.S. Patent No. 6,012,103 to Sartore et al.
- 1002 U.S. Patent No. 6,073,193 to Yap
- 1003 U.S. Patent No. 5,628,028 to Michelson
- 1004 PCCextend 100 User's Manual
- 1005 U.S. Patent No. 5,862,393 to Davis
- 1006 Prosecution History of U.S. Patent 6,012,103
- 1007 Prosecution History of U.S. Patent 6,249,825
- 1008 Prosecution History of U.S. Patent 6,493,770
- 1009 Prosecution History of European Patent Application No. 98931675.7
- 1010 European Patent Convention (EPC) Rule 29 (1973)
- 1011 Patent Assignment Records of the '103, '825, and '770 Patents
- 1012 Declaration of Dr. Andrew Wolfe
- 1013 USB Specification v 1.0
- 1014 U.S. Patent No. 5,590,273 to Balbinot
- 1015 U.S. Patent No. 6,338,109 to Snyder
- 1016 Quinnell, Richard A., "USB: A Neat Package with a Few Loose Ends," EDN Magazine
- 1017 Levine, Larry. PCMCIA Primer, pp. 117-130
- 1018 PCMCIA PC Card Standard Release 2.01, pp. 3-2 to 3-5; 4-2 to 4-7; 4-10 to 4-19; 4-28 to 4-3 1; 4- 34 to 4-37; 5-2 to 5-5; 5-12 to 5-21; 5-23; 5-48 to 5-5 1; 6-6 to 6-17

- 1019 PCMCIA Card Services Specification Release 2.0, pp. 3-2 to 3-7; 3-14 to 3-17; 3-20 to 3-25; 3- 28 to 3-29; 5-78 to 5-79
- 1020 U.S. Patent No. 5,537,654 to Bedingfield
- 1021 C.V. of Dr. Andrew Wolfe

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.