Apple, Inc. et al. v. Memory Integrity, L
and
Sony Corp. et al. v. Memory Integrity, L

IPR2015-00158, -00159, -00163
U.S. Patent No. 7,296,121

Patent Owner's Demonstratives

Overview

- **The references do not disclose the "states" limitation (cls. 1, 16, and 25)**

- **The references do not disclose the "programmed" limitation (cl. 11)**

- **The references do not disclose the "accumulating" limitation (cls. 13 and**

The "states" term

- **"a probe filtering unit which is operable to … transmit the pr[obe]
  with reference to probe filtering information representative [of]
  states associated with selected ones of the cache memories"**
  - **'121 Pat. cl. 1**

- **" the probe filtering unit being operable to … transmit the pr[obe]
  with reference to probe filtering information representative [of]
  states associated with selected ones of the cache memories"**
  - **'121 Pat. cl. 16**

- **"evaluating the probe with the probe filtering unit …, the eva[luating]
  being done with reference to probe filtering information ass[ociated]
  with the probe filtering unit and representative of states asso[ciated]
  with selected ones of the cache memories"**
  - **'121 Pat. cl. 25**

Construction of "states" term

- ## '121 Patent is directed to the field of cache coherency

BACKGROUND OF THE INVENTION

The present invention generally relates to accessing data in a multiple processor system. More specifically, the present invention provides techniques for reducing memory transaction traffic in a multiple processor system. Data access in multiple processor systems can raise issues relating to cache coherency. Conventional multiple proces-

'121 Pat. at 1:26-27 (cited by PO Resp. at 3)

Consequently, it is desirable to provide techniques for improving data access and cache coherency in systems having multiple processors connected using point-to-point links.

'121 Pat. at 2:39-42 (cited by PO Resp. at 3)

Construction of "states" term

- **In the field of cache coherency, "states" refers to cache coherency states**

> 15.   Although the term "state" may have many broad and different
>
> meanings in general English usage, as well as in the specific field of compu
>
> the term "state" connotes a specific meaning in the context of the field of c
>
> coherency. In the field of cache coherency, the term "state" is understood
>
> to a "cache coherency state." For example, in Sorin et al., *A Primer on Me*

Oklobdzija PO Resp. Decl. ¶ 15 (-00159, Ex. 2016)

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