UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION; SONY ELECTRONICS INC.; SONY MOBILE COMMUNICATIONS AB; AND SONY MOBILE COMMUNICATIONS (USA) INC. Petitioners

v.

MEMORY INTEGRITY, LLC
Patent Owner

U.S. Patent No. 7,296,121

Inter Partes Review Case No. 2015-00158

MEMORY INTEGRITY, LLC'S PATENT OWNER PRELIMINARY RESPONSE PURSUANT TO 37 CFR § 42.107(a)



TABLE OF CONTENTS

I.	INT	TRODUCTION1				
II.	TEO	CHNOLOGY BACKGROUND1				
III.		JMMARY OF PETITIONERS' PROPOSED GROUNDS FOR EVIEW3				
IV.		E PENDING PETITIONS FOR <i>INTER PARTES</i> REVIEW OF THE 1 PATENT PRESENT REDUNDANT GROUNDS4				
V.	MEMORY INTEGRITY'S CLAIM CONSTRUCTIONS10					
	A.	"probe filtering unit" (claims 1, 16, 25)1				
	В.	"states associated with selected ones of the cache memories" (claims 1, 16, and 25)				
		1.	The claimed "states" refers to cache coherence protocol states15			
		2.	A cache coherence protocol state is the current state of a data block in a protocol used to maintain the coherency of caches, in which a data block can only be in one current state at a time, and in which the current state can transition to a different state upon one or more triggering events or conditions			
		3.	"states associated with selected ones of cache memories" refers to the cache coherence protocol state(s) of data block(s) which are <i>stored</i> in the selected cache memories20			
	C.	"accumulate responses to each probe" and "accumulating probe responses" (claims 15 and 25)				
VI.	PRI	EVA]	IS NO REASONABLE LIKELIHOOD OF PETITIONERS ILING AS TO A CHALLENGED CLAIM OF THE '121 Γ26			
	A.	Nov	ims 1-3, 8, 15-18 and 25 Are Entitled To A Priority Date Of vember 4, 2002 And Therefore Koster Does Not Qualify As or Art Against These Claims			



1

B.	3. Petitioners Failed to Demonstrate That Koster Anticipates C 1-3, 8, 11-12, 14-16 and 25					
	1.	Koster Does Not Disclose "Probe Filtering Information" "Representative Of States Associated With Selected Ones Of The Cache Memories" As Recited In Claims 1-3, 8, 11-12, 14- 16, and 25				
	2.	Koster Does Not Disclose "Accumulate Responses to Each Probe" and "Accumulating Probe Responses" As Recited In Claims 15 and 25				
	3.	Koster Does Not Disclose That "Each Of The Processing Nodes Is Programmed To Complete A Memory Transaction After Receiving A First Number Of Responses" As Recited In Claim 11				
	4.	Koster Does Not Disclose "Temporary Storage For Holding Read Response Data" As Recited in Claim 1237				
	5.	Koster Does Not Disclose That "The Probe Filtering Unit Is Further Operable To Modify The Probes" As Recited In Claim 14				
C.	Petitioners Failed To Demonstrate That Claims 17-18 and 24 Are Obvious Over Koster Alone					
D.		Petitioners Failed To Demonstrate That Claims 19-23 Are Obvious Over Koster In View of Kuskin				
Е.	Petitioners Failed To Demonstrate That Claims 15 and 25 Are Obvious Over Koster In View of Kuskin and Park					
	1.	The Petition Fails to Demonstrate That The Combination of Koster, Kuskin and Park Teaches All Of The Limitations Of Claims 15 Or 25				
		a. The Combination of Koster, Kuskin and Park Does Not Teach "Probe Filtering Information Representative Of States" As Recited In Claims 15 and 2540				



		b.	The Combination of Koster, Kuskin and Park Does Not Teach All "Probe" Limitations Of Claims 15 and 25	41
		c.	The Combination Of Koster, Kuskin, and Park Do Not Teach "Evaluating The Probe With The Probe Filtering Unit To Determine Whether A <i>Valid</i> Copy Of The Memory Line Is In Any Of The Cache Memories" As Recited in Claim 25	43
	2.	In Th	oners Failed To Show That A Person Of Ordinary Skill are Art Would Have Been Motivated To Combine Koster Park's Delayed "Read/Write" Access Mode	44
F.			s Failed To Demonstrate That Claims 1-3, 8, 11-12, 14- -25 Are Obvious Over Luick In View of Kosaraju	45
	1.	Luick	Petition Fails to Demonstrate That The Combination of and Kosaraju Teaches All Of The Limitations Of ns 1-3, 8, 11-12, 14-18, and 24-25	46
		a.	The Combination of Luick and Kosaraju Does Not Teach "Probe Filtering Information Representative Of States" As Recited In Claims 1-3, 8, 11-12, 14-18, and 24-25	46
		b.	The Combination of Luick and Kosaraju Does Not Teach "A Probe Filtering Unit" As Recited In Claims 1- 3, 8, 11-12, 14-18, and 24-25	48
		c.	The Combination of Luick and Kosaraju Does Not Teach "Accumulate Responses to Each Probe" and "Accumulating Probe Responses" As Recited In Claims 15 and 25	51
		d.	The Combination Of Luick and Kosaraju Does Not Teach "Evaluating The Probe With The Probe Filtering Unit To Determine Whether A <i>Valid</i> Copy Of The Memory Line Is In Any Of The Cache Memories" As Recited in Claim 25	51



	e. The Combination Of Luick and Kosaraju Does Not Teach "The Probe Filtering Unit Corresponds to an Additional Node" As Recited in Claim 2	53
	f. The Combination Of Luick and Kosaraju Does Not Teach That "Each Of The Processing Nodes Is Programmed To Complete A Memory Transaction After Receiving A First Number Of Responses" As Recited in Claims 11 and 12	54
	g. The Combination Of Luick and Kosaraju Does Not Teach "The Probe Filtering Unit Is Further Operable To Modify The Probes" As Recited in Claim 14	55
	2. Petitioners Failed To Show That A Person Of Ordinary Skill In The Art Would Have Been Motivated To Replace Luick's Bus Architecture With Kosaraju's Point-to-Point Architecture5	56
G.	Petitioners Failed To Demonstrate That Claims 19-23 Are Obvious Over Luick In View of Kosaraju and Kuskin	58
H.	Petitioners Failed To Demonstrate That Claims 15 and 25 Are Obvious Over Luick In View of Kosaraju, Kuskin, and Park	58
VII CONO	CLUSION	50



DOCKET

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.

