Patent No. 7,296,121 IPR2015-00158

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

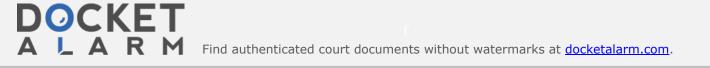
v.

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 MOTION TO AMEND PURSUANT TO 37 CFR § 42.121



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C.	Construction of "modified state," "exclusive state," "shared state," and "invalid state"			
D.	Construction of "coherent protocol interface" and "non-coherent protocol interface"			
IV. SCOPE OF THE PROPOSED SUBSTITUTE CLAIMS [37 C.F.R. § 42.121(A)(2)(I)-(II)]				
V. THE PROPOSED SUBSTITUTE CLAIMS SHOULD BE ALLOWED IF THE RESPECTIVE ORIGINAL CLAIMS ARE FOUND UNPATENTABLE				
А.	The Pong and Koster references are the only references which arguably teach probe filtering in a system with processing nodes connected by point-to-point links			
В.	No eligible prior art reference discloses "a probe filtering unit coupled to a coherent protocol interface and a non-coherent protocol interface"			
VI. CONCLUSION				

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## EXHIBIT LIST

Exhibit No.	Description
Memory Integrity Ex.	Claims Appendix in Support of Motion to Amend
2018 Memory Integrity Ex.	Declaration of Vojin Oklobdzija, PhD in Support of
2019	Motion to Amend
Memory Integrity Ex.	U.S. Patent Application No. 10/966,161 ("the '161
2020	App.")
Memory Integrity Ex. 2021	U.S. Patent Application No. 10/157,388 ("the '388 App.")
Memory Integrity Ex. 2022	U.S. Patent Application No. 10/156,893 ("the '893 App.")
Memory Integrity Ex. 2023	Papamarcos et al., A Low-Overhead Coherence Solution For Multiprocessors With Private Cache Memories (1984)
Memory Integrity Ex.	Fong Pong et al., Design and Performance of SMPs
2024	With Asynchronous Caches (Nov. 1999)
Memory Integrity Ex. 2025	U.S. Patent No. 7,103,725
Memory Integrity Ex. 2026	U.S. Patent No. 7,395,379
Memory Integrity Ex. 2027	U.S. Patent No. 7,653,790
Memory Integrity Ex. 2028	U.S. Patent No. 7,251,698
Memory Integrity Ex. 2029	U.S. Patent No. 7,155,525
Memory Integrity Ex. 2030	U.S. Patent No. 7,281,055
Memory Integrity Ex. 2031	U.S. Patent No. 6,865,595
Memory Integrity Ex. 2032	U.S. Patent No. 7,103,636
Memory Integrity Ex. 2033	U.S.P.T.O. Assignment Database Records for U.S. Patent No. 7,296,121
Memory Integrity Ex. 2034	U.S.P.T.O. Assignment Database Records for U.S. Patent No. 7,003,633

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	U.S.P.T.O. Assignment Database Records for U.S.
	Patent Nos. 7,103,725, 7,107,408, 7,107,409,
Memory Integrity Ex.	7,395,379, 7,653,790, 7,251,698, 7,155,525, 7,281,055,
2035	6,865,595 and 7,103,636
Memory Integrity Ex.	Proprietary Information and Invention Assignment
2036	Agreement of David B. Glasco
Memory Integrity Ex.	Hellwagner et al., SCI: Scalable Coherent Interface
2037	(1999)
	Defendants' Answer in Memory Integrity LLC v.
Memory Integrity Ex.	Samsung Electronics Company Ltd. et al, Dkt. No. 12
2038	(D. Del.)
	Redacted copy of Invalidity Contentions for '121
Memory Integrity Ex.	Patent served by Intel Corporation in Memory Integrity
2039	LLC v. Intel Corporation, (D. Or.)
Memory Integrity Ex.	U.S. Patent Publ. No. 2002/0053004 ("Pong")
2040	

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