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 RESPONSE PURSUANT TO 37 CFR § 42.120(a)



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# **EXHIBIT LIST**

Exhibit No.	Description
Memory Integrity-2001	Plaintiff Memory Integrity, LLC's Initial Identification of Asserted Claims And Accused Products, served on Petitioners in <i>Memory Integrity LLC v. Amazon.com Inc.</i> , et al., Nos. 1:13-cv-01795, -01796, -01802, -01808 (D. Del. served Oct. 13, 2014)
Memory Integrity-2002	Excerpts from D. E. Culler, J. P. Singh, and A. Gupta PARALLEL COMPUTER ARCHITECTURE, pp. 279-280 (1999)
Memory Integrity-2003	Sorin <i>et al.</i> , "Specifying and Verifying a Broadcast and a Multicast Snooping Cache Coherence Protocol," IEEE TRANSACTIONS ON PARALLEL AND DISTRIBUTED SYSTEMS, Vol. 13, No. 6, pp. 1-23(June 2002)
Memory Integrity-2004	Excerpts from Merriam-Webster's Collegiate Dictionary (10 <sup>th</sup> ed. 1999)
Memory Integrity-2005	Excerpts from David A. Patterson, <i>et al.</i> , Computer Organization and Design (3d ed. 2005)
Memory Integrity-2006	U.S. Patent Application No. 10/288,347
Memory Integrity-2007	U.S. Patent No. 7,107,408 to Glasco
Memory Integrity-2008	U.S. Patent No. 7,107,409 to Glasco
Memory Integrity-2009	Not Used
Memory Integrity-2010	Sorin, et al., A PRIMER ON MEMORY CONSISTENCY AND CACHE COHERENCE (2011)
Memory Integrity-2011	Excerpts from D. E. Culler, J. P. Singh, and A. Gupta PARALLEL COMPUTER ARCHITECTURE, pp. 302, 307-310 (1999)
Memory Integrity-2012	Excerpts from Microsoft Computer Dictionary (1999)
Memory Integrity-2013	Excerpts from Modern Dictionary of Electronics (7 <sup>th</sup> ed. 1999)
Memory Integrity-2014	Excerpts from Merriam-Webster's Collegiate Dictionary (10 <sup>th</sup> ed. 1999)



Exhibit No.	Description
Memory Integrity-2015	Excerpts from Laughton et al., ELECTRICAL ENGINEER'S REFERENCE BOOK, pp. 15/3 (16 <sup>th</sup> ed. 2003)
Memory Integrity-2016	Declaration of Vojin G. Oklobdzija, PhD in Support of Patent Owner's Responses
Memory Integrity-2017	Curriculum Vitae of Vojin G. Oklobdzija, PhD



# **TABLE OF AUTHORITIES**

Page(s)
Cases
Microsoft Corp. v. Proxyconn, Inc., 789 F.3d 1292 (Fed. Cir. 2015)
Statutes
35 U.S.C. § 316(e)
Other Authorities
37 C.F.R. § 42.1(d)
Decision on Institution of <i>Inter Partes</i> Review1
Teffrey Kuskin, et al., The Stanford FLASH Microprocessor, PROCEEDINGS OF THE 21 <sup>st</sup> Annual International Symposium on Computer Architecture, IEEE (1994)
Sorin, et al., A Primer on Memory Consistency and Cache Coherence (2011)4
Sorin, et al., Specifying and Verifying a Broadcast and a Multicast Snooping  Cache Coherence Protocol (2002)



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