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.

Case IPR2015-00158
Patent 7,296,121 B2

**PETITIONERS' REPLY TO PATENT OWNER'S
RESPONSE TO PETITION**

TABLE OF CONTENTS

TABLE OF AUTHORITIES

LIST OF EXHIBITS

Ex. No.	Exhibit Name
Sony-1001	U.S. Patent No. 7,296,121 ("the '121 Patent")
Sony-1002	File History for U.S. Pat. App. No. 10/966,161
Sony-1003	U.S. Patent No. 7,003,633 ("the '633 Patent")
Sony-1004	Comparison of '121 Patent and '633 Patent Specifications
Sony-1005	U.S. Patent No. 7,698,509 to Koster ("Koster")
Sony-1006	Jeffrey Kuskin, et al., *The Stanford FLASH Multiprocessor*, PROCEEDINGS ON THE 21ST ANNUAL INTERNATIONAL SYMPOSIUM ON COMPUTER ARCHITECTURE, IEEE (1994) ("Kuskin")
Sony-1007	S. Park et al., *Verification of Cache Coherence Protocols by Aggregation of Distributed Transactions*, Theory of Computing Systems 31 (1998) ("Park")
Sony-1008	U.S. Patent No. 6,088,769 to Luick ("Luick")
Sony-1009	U.S. Pat. Pub. 2002/0073261 ("Kosaraju")
Sony-1010	AUTHORITATIVE DICTIONARY OF IEEE STANDARDS TERMS (2000)
Sony-1011	Jeffrey L. Hilbert, APPLICATION SPECIFIC INTEGRATED CIRCUIT (ASIC) TECHNOLOGY (Academic Press 1991)
Sony-1012	Ronald Sass, Andrew G. Schmidt, EMBEDDED SYSTEMS DESIGN WITH PLATFORM FPGAS: PRINCIPLES AND PRACTICES (Morgan Kaufmann 2010)
Sony-1013	Expert Declaration of Daniel J. Sorin
Sony-1014	Curriculum Vitae of Daniel J. Sorin
Sony-1015	Supplemental Expert Declaration of Daniel J. Sorin
Sony-1016	Deposition Transcript of Vojin Oklobdzija (November 23–24, 2015)

I.   INTRODUCTION

Sony Corporation, Sony Electronics Inc., Sony Mobile Communications AB, and Sony Mobile Communications (USA) Inc. (collectively, "Petitioners") hereby submit their reply to Patent Owner's Response to Petition (Paper No. 17, "Response"). In its Decision on Institution of *Inter Partes* Review (Paper No. 7, "Institution Decision"), the Patent Trial and Appeal Board ("Board") instituted review of claims 19–24 of U.S. Patent No. 7,296,121 ("the '121 patent"). In particular, the Board instituted review of claim 24 as obvious over U.S. Patent No. 7,698,509 to Koster *et al*. ("Koster"), and claims 19–23 as obvious over Koster in view of Jeffrey Kuskin, *et al*., *The Stanford FLASH Microprocessor*, PROCEEDINGS OF THE 21ST ANNUAL INTERNATIONAL SYMPOSIUM ON COMPUTER ARCHITECTURE, IEEE (1994) ("Kuskin"). The Patent Owner's Response has essentially one argument—that the Board's Institution Decision relied on an incorrect claim construction of the term "states." As described below however, the Board's construction of "states" was correct, and accordingly claims 19–24 are unpatentable. Moreover, claims 19–24 are unpatentable even under Patent Owner's incorrect construction of "states" because Koster discloses such states.

DOCKET ALARM

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.