
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC., HTC CORPORATION, HTC AMERICA, INC., SAMSUNG
ELECTRONICS CO. LTD, SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG TELECOMMUNICATIONS AMERICA, LLC AND
AMAZON.COM, INC.
Petitioners

v.

MEMORY INTEGRITY, LLC
Patent Owner

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

Inter Partes Review Case No. 2015-00159

**MEMORY INTEGRITY, LLC'S PATENT OWNER
MOTION TO AMEND PURSUANT TO 37 CFR § 42.121**

TABLE OF CONTENTS

I. STATEMENT OF RELIEF REQUESTED1

II. SUPPORT FOR THE SUBSTITUTE CLAIMS [37 CFR § 42.121(B)(1)-(2)]1

 A. The ‘347 and ‘161 Applications Disclose the Limitations of Original Claim 162

 B. The ‘347 and ‘161 Applications Disclose the Limitations of Original Claims 17 and 185

 C. The ‘347 and ‘161 Applications Discloses the Limitations of Original Claims 19-24 Via Incorporation By Reference6

 D. The ‘347 and ‘161 Applications Disclose the New Proposed Limitations of Substitute Claims 26-349

III. CONSTRUCTION OF THE PROPOSED NEW LIMITATIONS11

 A. Construction of “cache coherency state”11

 B. Construction of “cache coherence protocol”12

 C. Construction of “*modified state*,” “*exclusive state*,” “*shared state*,” and “*invalid state*”14

 D. Construction of “*coherent protocol interface*” and “*non-coherent protocol interface*”16

IV. SCOPE OF THE PROPOSED SUBSTITUTE CLAIMS [37 C.F.R. § 42.121(A)(2)(I)-(II)]17

V. THE PROPOSED SUBSTITUTE CLAIMS SHOULD BE ALLOWED IF THE RESPECTIVE ORIGINAL CLAIMS ARE FOUND UNPATENTABLE.....18

 A. 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.....19

B. No eligible prior art reference discloses “a probe filtering unit coupled to a coherent protocol interface and a non-coherent protocol interface”22

VI. CONCLUSION.....25

EXHIBIT LIST

Exhibit No.	Description
Memory Integrity Ex. 2018	Claims Appendix in Support of Motion to Amend
Memory Integrity Ex. 2019	Declaration of Vojin Oklobdzija, PhD in Support of Motion to Amend
Memory Integrity Ex. 2020	U.S. Patent Application No. 10/966,161 (“the ’161 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. 2024	Fong Pong et al., Design and Performance of SMPs 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

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

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