
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
RESPONSE PURSUANT TO 37 CFR § 42.120**

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II. CLAIM CONSTRUCTION1

 A. “states”1

 B. “programmed”11

III. THE INSTITUTED CLAIMS SHOULD BE UPHELD AS VALID17

 A. Pong and the other prior art at issue do not enable the limitations of the independent claims of the ’121 Patent17

 B. Pong fails to disclose “states” as that term is properly construed, which is recited in each independent claim of the ’121 Patent25

 C. Pong fails to disclose “probes” as that term is properly construed, which is recited in each independent claim of the ’121 Patent28

 D. Pong fails to disclose the “programmed” limitation of claim 1130

 E. Thus, Petitioners have failed to demonstrate that Pong anticipates claim 11. Additionally, because Petitioners’ anticipation argument as to claim 12, which is dependent on claim 11, relies on the same arguments, Petitioners have also failed to demonstrate that Pong anticipates claim 12. Pong fails to disclose the “accumulate responses to each probe” limitation of claim 15 and the “accumulating probe responses” limitation of claim 2534

 F. Pong does not disclose the “valid copy” limitation of claim 2537

 G. Smith, in combination with Pong, does not cure Pongs’ failures to disclose limitations of independent claim 1637

IV. CONCLUSION.....38

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., et al.</i> , 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 th 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 th ed. 1999)
Memory Integrity-2014	Excerpts from Merriam-Webster's Collegiate Dictionary (10 th ed. 1999)

Exhibit No.	Description
Memory Integrity-2015	Excerpts from Laughton et al., ELECTRICAL ENGINEER'S REFERENCE BOOK, pp. 15/3 (16 th 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

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<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005) (<i>en banc</i>)	15
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<i>White Consol. Indus. v. Vega Servo-Control, Inc.</i> , 713 F.2d 788 (Fed. Cir. 1983)	24
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