Patent No. 7,296,121 IPR2015-00163

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. 2015-00163

MEMORY INTEGRITY, LLC'S PATENT OWNER RESPONSE PURSUANT TO 37 CFR § 42.120



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B. "programmed"12			
C. "read response data"19			
III. PETITIONERS HAVE NOT MET THEIR BURDEN TO SHOW UNPATENTABILITY OF THE INSTITUTED CLAIMS			
 A. Petitioners Failed to Demonstrate That Koster Anticipates Claims 4-6 and 11-12			
 Koster Does Not Disclose "Probe Filtering Information Representative Of States Associated With Selected Ones Of The Cache Memories" As Required By Claims 4-6 and 11-1221 			
 Koster Does Not Disclose That "Each Of The Processing Nodes Is Programmed To Complete A Memory Transaction After Receiving A First Number Of Responses" As Recited In Claims 11 and 12			
 Koster Does Not Disclose "Temporary Storage Associated Therewith For Holding Read Response Data" As Recited in Claim 12			
 B. Petitioners Failed To Demonstrate That Claims 19-24 Are Obvious Over Koster In View of Smith			
 The Petition Fails To Demonstrate That The Combination Of Koster And Smith Teaches The "Probe Filtering Information Representative Of States" Limitation Of Claims 19-24			
IV. CONCLUSION			

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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</i> <i>Inc., et al.</i> , Nos. 1:13-cv-01795, -01796, -01802, -01808 (D. Del. <i>served</i> 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	Declaration of Jonathan D. Baker in Support of Patent Owner's Opposition to Petitioner's Motion to Correct Exhibit 1007 Pursuant to 37 C.F.R. § 42.104(c)
Memory Integrity-2007	U.S. Patent Application No. 10/288,347
Memory Integrity-2008	U.S. Patent No. 7,107,408 to Glasco
Memory Integrity-2009	U.S. Patent No. 7,107,409 to Glasco
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)

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Exhibit No.	Description
Memory Integrity-2014	Excerpts from Merriam-Webster's Collegiate Dictionary (10 th ed. 1999)
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>)16
<i>Therasense, Inc. v. Becton, Dickinson & Co.,</i> 593 F.3d 1325 (Fed. Cir. 2010)
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