

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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HTC Corporation,  
HTC America, Inc.,  
LG Electronics, Inc.,  
Samsung Electronics, Co., Ltd., and  
Samsung Electronics America, Inc.  
PETITIONERS

V.

Parthenon Unified Memory Architecture LLC  
PATENT OWNER

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Case IPR No: 2015-01501

Patent No. 7,777,753

Title: ELECTRONIC SYSTEM AND METHOD FOR SELECTIVELY ALLOWING ACCESS TO  
A SHARED MEMORY

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**PATENT OWNER RESPONSE**  
**PURSUANT TO 35 U.S.C. § 316 AND 37 C.F.R. §42.120**

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**TABLE OF EXHIBITS**

<b>Exhibit No.</b>	<b>Exhibit Description</b>
1001	U.S. Patent No. 7,777,753 (“753 Patent”) <sup>1</sup>
1002	File History of 753 Patent
1003	U.S. Patent No. 5,546,547 (“Bowes”)
1004	The “MPEG Standard” or “MPEG”
1005	S. Rathnam <i>et al.</i> , “An Architectural Overview of the Programmable Multimedia Processor, TM-1,” IEEE Proceedings of COMPCON ’96, pp. 319-326 (1996) (“Rathnam”)
1007	U.S. Patent No. 5,774,676 (“Stearns”)
1030	Expert Declaration of Dr. Harold Stone (“Stone Decl.”)
2001	DSP3210 Information Manual
2002	Affidavit of Mitchell A. Thornton Relating to Ex. 2003
2003	AT&T DSP3210 Digital Signal Processor The Multimedia Solution, Data Sheet, AT&T Microelectronics, March 1993 (“DSP3210 Datasheet”)
2004	Affidavit of Mitchell A. Thornton Relating to Ex. 2005
2005	Developer Note – Macintosh Quadra 840AV and Macintosh Centris 660AV Computers (“Quadra Developer Notes”)
2006	Deposition testimony of Harold S. Stone, Phd. dated March 17, 2016 (“Stone Depo”)
2007	Excerpts from Stone, H.S., High-Performance Computer Architecture, Addison-Wesley Publishing Company, Reading, Massachusetts, 1993, ISBN 0-201-52688-3.
2008	Kitson, F. and Bhaskaran, V., Interactive Video from Desktops to Settops, HPL-95-58, Hewlett-Packard white paper, June 1995
2009	Declaration of Mitchell A. Thornton (“Thornton Decl.”)

<sup>1</sup> Ex. 1001, 1002, 1003, 1004, 1005, 1007, 1030 and 2001 are already of record and not attached to this Response.

**I. INTRODUCTION**

The patent owner Parthenon Unified Memory Architecture LLC (“Patent Owner”) hereby submits the following response to the Petition for *Inter Partes* review (“Petition”) filed by HTC Corp., HTC America, Inc., LG Electronics, Inc., Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. (collectively, “Petitioner”) regarding certain claims of U.S. Patent No. 7,777,753 (“753 Patent”) filed on June 24, 2015 and Decision Granting Institution of *Inter Partes Review* 37 C.F.R. 42.108 issued on January 6, 2016 (“Institution Decision”).

The Board instituted an *Inter Partes* review with respect to the following three proposed grounds:

1. Alleged Ground C: Obviousness of claims 1 and 2 under 35 U.S.C. § 103 over Bowes and the MPEG Standard;
2. Alleged Ground D: Obviousness of claim 3 under 35 U.S.C. § 103 over Bowes, the MPEG Standard and Stearns; and
3. Alleged Ground E: Obviousness of claim 4 under 35 U.S.C. § 103 over Bowes, the MPEG Standard and Shanley.

For the reasons discussed below, Bowes and the MPEG Standard do not render claims 1 and 2 obvious. Claims 3 and 4 are allowable for at least the

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