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., and
LG ELECTRONICS, INC.,
Petitioners,

v.

PARTHENON UNIFIED MEMORY ARCHITECTURE LLC,
Patent Owner.
_____

Case IPR2015-01502
Patent 7,542,045
_____

**PATENT OWNER'S OBSERVATIONS ON THE CROSS-XAMINATION
OF HAROLD S. STONE, PH.D.**

1.   In Ex. 2013 (18:8-19:13), Dr. Stone testified that at the time of the invention, there were decoders that had dedicated memory and there were decoders that did not have dedicated memory. However, Dr. Stone could not say which was the typical configuration at the time of the invention. This testimony is relevant to and contradicts paragraph 3 of Dr. Stone's Reply Declaration, Ex. 1032 ("Declaration"), where Dr. Stone opined that "[t]here is no support" for Dr. Thornton's opinion that at the time of the invention, a typical decoder required its own dedicated memory.

2.   In Ex. 2013 (50:9-54:16), Dr. Stone testified that the DSP3210 included a local RAM block that could be dedicated to the DSP3210. This testimony is relevant to and contradicts the statement in paragraph 35 of the Declaration, where Dr. Stone opined that the DSP3210 did not include a dedicated local RAM.

3.   In Ex. 2013 (54:17-23; 55:23-56:18), Dr. Stone testified that he does not offer an opinion on whether Dr. Thornton's interpretation is consistent with the specification of the `368 Patent, the `045 Patent and the `753 Patent. This testimony is relevant to and contradicts the statement in paragraph 47 of the Declaration where Dr. Stone states that "Prof. Thornton's opinion is in conflict with the specifications of the `368, `753, and `045 patents."

4.   In Ex. 2013 (77:12-19), Dr. Stone testified that Table 3 in Exhibit 2008 ("Kitson") states that the MIPS requirement for MPEG-2 is 524 MIPS. This testimony is relevant to and contradicts the statement in paragraph 21c of the Declaration where Dr. Stone states that "[t]he requirement of 524 MIPS in Ex. 2008 at 8 is specious."

5.   In Ex. 2013 (79:9-24, 80:16-81:8; 12:20-13:1; 13:15-14:4), Dr. Stone testified that the MIPS requirement he pointed to in Konstantinides related to the Px64, not the MPEG-2. He further testified that Px64 is a low resolution, low repetition rate standard for video conferencing and that a Px64 decoder generally cannot decode an MPEG-2 or MPEG-1 bit stream. This testimony is relevant to and contradicts the statement in paragraph 21c of the Declaration where Dr. Stone relies on Konstantinides to suggest that "[t]he requirement of 524 MIPS in Ex. 2008 at 8 is specious."

Dated: August 15, 2016   Respectfully submitted,

                                          /s/Masood Anjom
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Patent Owner's Observations on Cross-Examination of Harold S. Stone, Exhibit 2013, and an updated Exhibit List for this proceeding were served on this Monday, August 15, 2016 by electronic mail to the following:

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