UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Case IPR No: 2015-01502

Patent No. 7,542,045

Title: ELECTRONIC SYSTEM AND METHOD FOR DISPLAY USING A DECODER AND ARBITER TO SELECTIVELY ALLOW ACCESS TO A SHARED MEMORY

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. 37 C.F.R. §42.107



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IV. Chall	PETITIONER DOES NOT ESTABLISH A REASONABLE LIKELIHOOD THAT ANY ENGED CLAIM IS INVALID	8
A.	Rathnam (claims 1-2, 4-7, 9-10, 12-13 and 15-17)	8
1. video	Rathnam does not disclose a video decoder configured to receive a current image to be decoded from the [main]/[system] memory1	
2. [main	Rathnam does not disclose the video decoder receiving data from the n]/[system] memory corresponding to a previously decoded video image1	9
3. recite	Rathnam's VLIW CPU cannot be both the recited video decoder and the ed CPU2	3
4. the [1	Rathnam does not disclose a microprocessor that stores non-image data in main]/[system] memory2	
5. main	Rathnam does not disclose an arbiter that controls access to the /system memory2	8
B.	Bowes and the MPEG Standard (claims 1, 4-5, 7, 10, 12, 16-17)3	1
1. Pater	The MPEG Standard Was Considered During the Prosecution of the `045 nt3	1
2. Ever	The Combination of Bowes and the MPEG Standard Does Not Disclose y Element of the Challenged Claims3	2
a.	The proposed combination does not disclose the video decoder receiving an image to be decoded and a previously decoded image from the [main]/[system] memory	2
b.	The proposed combination does not disclose an arbiter that controls access to the main/system memory	
3.	No Motivation to Combine Bowes and the MPEG Standard	ጸ



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C.	Bowes, the MPEG Standard and Rathnam (claims 9, 15)	45
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