

UNITED STATES PATENT AND TRADEMARK OFFICE
ALEXANDRIA, VIRGINIA

SAMSUNG ELECTRONICS CO., LTD,

Petitioner

vs.

ELBRUS INTERNATIONAL LIMITED,

Patent Owner

IPR 2015-01524

Patent 6,366,130

U.S. Patent Number 6,366,130

Alexandria, Virginia

Tuesday, October 18, 2016

HEARING before Judge Jeffrey W. Abraham, Judge Justin T. Arbes, and Judge Daniel J. Galligan (via videoconference), taken before Michele E. Eddy, RPR, CRR, and Notary Public, taken at the U.S. Patent and Trademark Office, 600 Dulany Street, 9th Floor, Alexandria, Virginia, at 1:00 p.m.

A P P E A R A N C E S

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P R O C E E D I N G S

Alexandria, Virginia

October 18, 2016

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JUDGE ABRAHAM: Please be seated. Good afternoon. We are here for the oral hearing in IPR 2015-01524 concerning U.S. Patent Number 6,366,130. I am Judge Abraham, and with me is Judge Arbes, and we have Judge Galligan joining us remotely.

We'll start with introductions from counsel, but before we do that, I just want to remind everybody, because we do have a judge participating remotely, it's important that you speak loudly and into the microphone so that he can hear you, okay?

All right. So let's start with introductions. We'll go with Petitioner.

MR. MODI: Good afternoon, Your Honors. Naveen Modi on behalf of Petitioner Samsung. With me is Joseph Rumpler.

JUDGE ABRAHAM: Welcome. Thank you.

Patent owner?

MR. KRAFT: Good afternoon, Your Honors. I'm Clifford Kraft, and I represent the patent owner.

JUDGE ABRAHAM: Thank you. Welcome.

Okay. Pursuant to our order of September 15, 2016, each side will have 40 minutes to argue. Petitioner, with the burden of proof, will go first. You may reserve rebuttal time if you would like. Patent owner will then have a chance to respond. And then followed by any rebuttal from Petitioner.

To the extent that you do use demonstratives today, we ask that you please

1 refer to slide numbers in the record so that it provides for a clear record. It will
2 also allow Judge Galligan to follow along since he is not able to see the screen.
3 Just remember that as you're going through your presentations.

4 With that, I'll invite Petitioner to begin and ask if you would like to reserve
5 any time for rebuttal.

6 MR. MODI: Yes, Your Honor, I would, 15 minutes, please.

7 JUDGE ABRAHAM: You can start whenever you're ready.

8 MR. MODI: Thank you, Your Honors. May it please the Board, I'm
9 Naveen Modi on behalf of Petitioner Samsung.

10 Based on the petition and supporting evidence, the Board instituted a
11 review of certain claims of the '130 patent. The record now includes even more
12 evidence than before and that supports the Board's decision and the petition. The
13 Board should now issue a final decision cancelling all the claims at issue. Let me
14 explain why.

15 So if we turn to slide 2, here we have an image from the institution
16 decision. As the Board is well aware, there are three grounds at issue in this
17 proceeding. There's a ground based on Sukegawa and Lu. There's another ground
18 based on Sukegawa, Lu, and Watanabe. And then there's a ground based on
19 Sukegawa, Lu, and Hardee.

20 If you turn to slide 3, what you can see here is the independent claim that's
21 at issue here. That's claim 1. That's the only claim at issue, as the Board is aware,
22 in terms of the independent claim. The rest of them are the dependent claims.

23 What we've highlighted for the Board's convenience are some of the terms
24 that we'll be discussing today. I know the Board has looked at the record. So I
25 won't spend too much time on this claim. But, basically in essence, this claim
26

1 claims a data transfer arrangement. It includes two bus drivers, a voltage
2 precharge source, a differential bus. Then we have a latching sense amplifier.
3 That includes a first stage and an output stage. And then the first stage is
4 connected to a differential data bus, and then there's the precharging limitation,
5 which I'm sure we'll spend some time on today.

6 So if we look at the Patent Owner's response, and now I'm on slide 4, the
7 patent owner's response essentially raises five issues in response to the petition and
8 the Board's institution decision, and they are shown on slide 4.

9 The first issue is whether Sukegawa and Lu teach the claimed differential
10 data bus, whether Sukegawa and Lu teach the claimed precharging, whether
11 Sukegawa and Lu render obvious claim 5, and then the last two are for claims 3
12 and claim 7.

13 For purposes of today, I will focus my presentation on issues 1, 2, and 4.
14 I'm happy to address any other issues that the Board would like me to address, but
15 we'll rest on our briefs on the other issues.

16 So with that, let me jump right into the first issue, whether Sukegawa and
17 Lu teach the claimed differential data bus. So let's just take a look at the claim
18 again. So now we're on slide 6. If you look at slide 6, as I indicated before, the
19 claim requires the differential data bus, and it also requires that the differential data
20 bus and the differential bus be precharged to a voltage V_{pr} .

21 So just to set the stage, as the Board is aware, the way the petition was set
22 up, it's our contention that Sukegawa discloses each of the limitations of the claim
23 except for -- with the exception of charging the differential data bus to V_{pr} . That's
24 really the only limitation that's missing from Sukegawa, from our perspective.

25 And we believe there's enough evidence in the record that one of ordinary
26

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