

Case No. IPR2015-01524  
U.S. Patent No. 6,366,130

Attorney Docket No.  
ELBRUS-IPR2

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SAMSUNG ELECTRONICS CO., LTD.

Petitioner

v.

ELBRUS INTERNATIONAL LIMITED

Patent Owner

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Case: IPR2015-01524

U.S. Patent No. 6,366,130

**PATENT OWNER'S PRELIMINARY RESPONSE**

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## **LIST OF EXHIBITS**

Exhibit 2001 - Action Closing Prosecution - Reexamination Control No.  
95/000,657.

## **I. INTRODUCTION**

The Petitioner Samsung Electronics Co. Ltd has requested *Inter-Partes* Review of 1) claims 1, 2, 5, 6, and 9 of United States Patent No. 6,366,130 (the `130 Patent) as being unpatentable under 35 U.S.C. § 103(a) over 1) Sukegawa (U.S. Patent No. 5,828,241) in view of Lu (IEEE Journal of Solid State Circuits); 2) claim 3 as being unpatentable over Sukegawa and Lu in further view of Watanabe (U.S. Patent No. 6,108,254); and 3) claim 7 as being unpatentable over Sukegawa and Lu in further view of Hardee (U.S. Patent No. 6,249,469).

### **A. PROBLEM SOLVED BY THE `130 PATENT**

The `130 patent relates to a data transfer arrangement such as might be used to read a semiconductor memory device. The arrangement includes a sense amplifier with two separate pre-charged buses, a differential bus and a differential data bus. These buses operate on alternate clock phases: one bus is being pre-charged while the other is transferring data and vice versa.

The data transfer arrangement operates at high speed and uses low power. This arrangement is less sensitive to deviations in voltage sources and deviation of the threshold voltages of the input transistors. This

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