IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent of Conley:	Petition for *Inter Partes* Review
U.S. Patent No. 7,818,490	Attorney Docket No.: 337722-000080.490
Issued: October 19, 2010	Customer No.: 26379
Title: PARTIAL BLOCK DATA PROGRAMMING AND READING OPERATIONS IN A NON-VOLATILE MEMORY	Petitioner: Apple Inc.
	Real Party in Interest: Apple Inc.

PETITION FOR *INTER PARTES* REVIEW OF

U.S. PATENT NO. 7,818,490

Mail Stop Patent Board
Patent Trial and Appeal Board
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

Pursuant to the provisions of 35 U.S.C. §§ 311-319, Apple Inc.

("Petitioner") hereby petitions the Patent Trial and Appeal Board to institute an

inter partes review of claims 66-72 and 94-106 of United States Patent

No. 7,818,490 (the "'490 patent") (Exh. 1001).

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Exhibit Number	Description
1001	U.S. Patent 7,818,490
1002	File History for U.S. Patent 7,818,490
1003	Declaration of Dr. Vivek Subramanian ("Subramanian Decl.")
1004	CV of Dr. Vivek Subramanian
1005	U.S. Patent 5,822,781 ("Wells")
1006	U.S. Patent No. 5,457,658 (Niijima)
1007	U.S. Patent No. 5,627,783 ("Miyauchi")
1008	Flash Memories, edited by Cappelletti, et al (1999) ("Cappelletti")
1009	PC Card Standard, Volumes 1 and 3 (1999) ("PC Card Standard")
1010	PCT WO 99/35650 ("Hazen")
1011	Designing With Flash Memory, Brian Dipert and Markus Levy (1994) ("Dipert")

I.   Mandatory Notices

A.   Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), the real party-in-interest is Apple Inc.

B.   Related Matters

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner states that Longitude Flash Memory Systems S.A.R.L. ("Patent Owner") is asserting U.S. Patent 7,818,490 (the "'490 patent") against the Real Party-In-Interest in a suit filed September 23, 2014, styled *Longitude Licensing Ltd., and Longitude Flash Memory Systems S.A.R.L. v. Apple Inc.*, Case No. 3:14-cv-4275, pending in the United States District Court for the Northern District of California (the "Litigation"). Petitioner has filed, or soon will file, petitions for *inter partes* review of U.S. Patent Nos. 6,510,488; 6,763,424 (the "'424 patent"); 6,831,865; 6,968,421; 7,012,835; 7,120,729; 7,224,607; 7,181,611; 7,657,702 (the "'702 patent"); 7,970,987; 8,050,095; and 8,316,177. Petitioner also is concurrently filing two other petitions for the '490 patent for claims other than the ones at issue in this petition.

The '424 patent, which is the grandparent of the '490 patent, was the subject of previous litigation and the following opinions in which claim terms found in both patents were construed: (1) *SanDisk Corp. v. Kingston Tech. Co.*, 695 F.3d 1348 (Fed. Cir. 2012); (2) *In the Matter of Certain Flash Memory Controllers*, United States Int'l Commission, Inv. No. 337-TA-619, Order No. 33, July 15, 2008

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