

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC.

Petitioner,

v.

LIMESTONE MEMORY SYSTEMS LLC

Patent Owner

Patent No. 6,233,181

Issue Date: May 15, 2001

Filed: Feb. 17, 1999

Inventor: Hideto Hidaka

Title: SEMICONDUCTOR MEMORY DEVICE WITH IMPROVED FLEXIBLE
REDUNDANCY SCHEME

Inter Partes Review No. IPR2016-00096

PATENT OWNER'S PRELIMINARY RESPONSE

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Table of Contents

	<u>Page</u>
I. INTRODUCTION	1
II. SUMMARY OF THE ‘181 PATENT	2
A. The Inventions Disclosed in the ‘181 Patent	2
B. Level of Ordinary Skill in the Art	5
C. Claim Interpretation	6
1. “word lines”	7
2. “spare memory cells”	9
3. “sense amplifier bands”	10
III. THE PETITION FAILS TO ESTABLISH A REASONABLE LIKELIHOOD THAT MICRON WILL PREVAIL AS TO THE GROUNDS ASSERTED CLAIMS 3 AND 5	12
A. Legal Standard	13
B. The Petition Fails To Establish That Claim 3 Is Obvious Over Sukegawa In View Of Prince Because It Does Not Show That Every Element Of The Claim Is Present In the Combined References	14
1. Neither Sukegawa Nor Prince Discloses Sense Amplifier Bands Located Between Memory Blocks	15
2. Neither Sukegawa Nor Prince Discloses Sharing Sense Amplifier Bands By Adjacent Memory Blocks In The Column Direction	29
IV. THE PETITION FAILS TO PROVIDE REASONED ANALYSIS OF FACTS THAT WOULD SATISFY THE PROPOSED CLAIM CONSTRUCTIONS	31
V. CONCLUSION	33

Table of Authorities

	<u>Page</u>
Cases	
<i>Am. Acad. of Sci. Tech. Ctr., In re</i> , 367 F.3d 1359 (Fed. Cir. 2004)	6
<i>Bass, In re</i> , 314 F.3d 575 (Fed. Cir. 2002)	6
<i>CCS Fitness, Inc. v. Brunswick Corp.</i> , 288 F.3d 1359 (Fed. Cir. 2002)	6
<i>Cuozzo Speed Techs., LLC, In re</i> , 778 F.3d 1271 (Fed. Cir. 2015)	6, 12
<i>Digital-Vending Servs. Int'l LLC v. Univ. of Phoenix, Inc.</i> , 672 F.3d 1270 (Fed. Cir. 2015)	9, 12
<i>Graham v. John Deere Co.</i> , 383 U.S. 1 (1966)	13
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007)	13
<i>NTP, Inc., In re</i> , 654 F.3d 1279 (Fed. Cir. 2011)	14, 31
<i>Rambus, Inc., In re</i> , 753 F.3d 1253 (Fed. Cir. 2014)	6
<i>Star Scientific, Inc. v. R.J. Reynolds Tobacco Co.</i> , 655 F.3d 1364 (Fed. Cir. 2011)	13
<i>Translogic Tech., Inc., In re</i> , 504 F.3d 1249 (Fed. Cir. 2007)	6
<i>Travelocity.com L.P. et al. v. Cronos Technologies, LLC</i> , CBM2014-00082 paper 12 (Oct. 16, 2014)	13
<i>Vivid Techs. v. Am. Sci. & Eng'g, Inc.</i> , 200 F.3d 795 (Fed. Cir. 1999)	6, 7, 10
Statutes	
35 U.S.C. § 103	13
35 U.S.C. § 313	1
Regulations	
37 C.F.R. § 42.100	6
37 C.F.R. § 42.107	1
37 C.F.R. § 42.108	2, 13, 30, 31
Constitutional Provisions	

IPR2016-00096: Patent Owner's Preliminary Response

Office Trial Practice Guide,
77 Fed. Reg. 48,756 (Aug. 14, 2012)6

I. INTRODUCTION

Patent Owner Limestone Memory Systems LLC (“LMS”) respectfully submits this Preliminary Response in accord with 35 U.S.C. § 313 and 37 C.F.R. § 42.107, responding to the Petition for *Inter Partes* Review (the “Petition”) filed by Micron Technology, Inc. (“Micron” or “Petitioner”) regarding claims of United States Patent No. 6,233,181 (“the ‘181 patent”)¹. Because the Petition incorrectly characterizes the disclosures of the prior art, it does not demonstrate a reasonable likelihood that claim 3 of the ‘181 patent is unpatentable. Claim 5 depends from claim 3 and is therefore not invalid for all of the same reasons as discussed below

¹ Micron has also filed four other petitions for *inter partes* review of four other patents (5,805,504; 5,894,441; 5,943,260; and 6,697,296) at issue in the co-pending litigation between the parties, *Limestone Memory Sys. LLC v. Micron Tech. Inc.*, 8:15-cv-00278 (C.D. Cal.) (“the co-pending litigation”). See IPR2016-00093–IPR2016-00097. The co-pending litigation, as well as 9 other consolidated suits against other defendants asserting one or more of the patents at issue in the co-pending litigation, have been stayed pending the outcome of the Board’s decisions on institution in these IPRs. See *Limestone Memory Sys. LLC v. Micron Tech. Inc. et al.*, 8:15-cv-00278 (C.D. Cal.), Doc. 69, January 12, 2016 (Order Granting Motions to Stay Cases Pending *Inter Partes* Review).

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