UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HTC CORPORATION, HTC AMERICA, INC.,
and APPLE, INC.
PETITIONERS

v.

Parthenon Unified Memory Architecture LLC
PATENT OWNER

_____

Case IPR2016-00923[1]
Patent 5,812,789

Title: VIDEO AND/OR AUDIO DECOMPRESSION AND/OR COMPRESSION DEVICE THAT
SHARES A MEMORY INTERFACE

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PATENT OWNER RESPONSE
PURSUANT TO 35 U.S.C. § 316 AND 37 C.F.R. §42.120

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[1] Case IPR2016-00847 has been joined with this proceeding.

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TABLE OF AUTHORITIES

Cases

Rules

TABLE OF EXHIBITS

Exhibit No.	Exhibit Description
1001	U.S. Patent No. 5,812,789 ("`789 Patent")[2]
1002	File History of `789 Patent
1019	Shanley, et al., "PCI System Architecture," Addison-Wesley Publishing Company, 1995 (3rd ed.) ("*Shanley*")
1030	Expert Declaration of Dr. Harold Stone ("Stone Decl.")
1032	U.S. Patent No. 5,682,484 ("Lambrecht")
1035	G. Moore, "Cramming more components onto integrated circuits," Electronics, Vol. 38, No. 8, Apr. 19, 1965 ("Moore")
1036	U.S. Patent No. 5,579,052 ("Artieri")
2003	Declaration of Mitchell A. Thornton ("Thornton Decl.")
2004	Deposition testimony of Harold S. Stone, Phd. dated November 16, 2016 ("Stone Depo")

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[2] Ex. 1001, 1002, 1019, 1030, 1032, 1035, and 1036 are already of record and not attached to this Response.

I.   INTRODUCTION

The patent owner Parthenon Unified Memory Architecture LLC ("Patent Owner") hereby submits the following response to the Petition for *Inter Partes* review ("Petition") filed by HTC Corp., HTC America, Inc., and Apple, Inc. (collectively, "Petitioner") regarding certain claims of U.S. Patent No. 5,812,789 ("`789 Patent") filed on April 20, 2016 and Decision Granting Institution of *Inter Partes Review* 37 C.F.R. 42.108 issued on August 23, 2016 ("Institution Decision").

The Board instituted an *Inter Partes* review with respect to the following three proposed grounds:

1. Alleged Ground A: Anticipation of claims 1, 3, 5, 11, and 13 under § 102(e) by Lambrecht;

2. Alleged Ground B: Obviousness of claim 4 under 35 U.S.C. § 103(a) over Lambrecht and Artieri; and

3. Alleged Ground C: Obviousness of claim 6 under 35 U.S.C. § 103(a) over Lambrecht and Moore.

For the reasons discussed below, Lambrecht does not anticipate independent claim 1. Dependent claims 3-6, 11, and 13 are allowable for at least the same reasons. The discussion below first discusses the `789 Patent and claims. It then rebuts the adopted grounds of unpatentability on the merits.

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