

IPR2016-01114
Patent Owner Response
U.S. Patent No. 7,777,753

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Apple, Inc.,
PETITIONER

v.

Parthenon Unified Memory Architecture LLC
PATENT OWNER

Case IPR No: 2016-01114

Patent No. 7,777,753

Title: ELECTRONIC SYSTEM AND METHOD FOR SELECTIVELY ALLOWING ACCESS TO
A SHARED MEMORY

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

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A. Bowes, Datasheet, Artieri, and Christiansen [claim 7] 3

1. Datasheet and Artieri do not disclose or render obvious “an arbiter included in the memory interface circuit of the decoder.” 3

2. Bowes does not disclose “an arbiter included in the memory interface circuit of the decoder.” 4

3. Bowes does not render obvious “an arbiter included in the memory interface circuit of the decoder.” 5

4. Bowes in combination with Christiansen does not render obvious “an arbiter included in the memory interface circuit of the decoder.” 7

B. Bowes, Datasheet, Artieri, Christiansen, and Arimilli [claims 8 and 10] . 8

C. Bowes, Datasheet, Artieri, Christiansen, and Shanley [claim 9] 9

D. Bowes, Datasheet, Artieri, Christiansen, and Gove [claim 12] 9

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TABLE OF AUTHORITIES

Cases

In re Fine,
837 F.2d 1076 (Fed. Cir.1988) 8, 9, 10

In re Wilson,
424 F.2d 1382 (CCPA 1970)3

Rules

35 U.S.C. § 1031

TABLE OF EXHIBITS

| Exhibit No. | Exhibit Description |
|--------------------|---|
| 1001 | U.S. Patent No. 7,777,753 (“753 Patent”) ¹ |
| 1005 | U.S. Patent No. 5,546,547 (“Bowes”) |
| 1011 | U.S. Patent No. 5,787,264 (“Christiansen”) |
| 2009 | Declaration of Mitchell A. Thornton (Thornton Decl.) |
| 2010 | Deposition testimony of Robert Colwell, Ph.D dated February 27, 2017 (“Colwell Depo.”). |
| 2011 | U.S. Patent No. 5,584,038 (“Papworth”) |

¹ Ex. 1001, 1005, and 1011 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 Apple, Inc. (“Petitioner”) regarding certain claims of U.S. Patent No. 7,777,753 (“753 Patent”) filed on May 31, 2016 and Decision Granting Institution of *Inter Partes Review* 37 C.F.R. 42.108 issued on December 7, 2016 (“Institution Decision”).

The Board instituted an *Inter Partes* review with respect to the following proposed grounds (collectively “Instituted Grounds”):

1. Obviousness of claims 1 and 2 under 35 U.S.C. § 103 over Bowes, Datasheet, Artieri, and Arimilli;
2. Obviousness of claim 4 under 35 U.S.C. § 103 over Bowes, Datasheet, Artieri, Arimilli, and Shanley;
3. Obviousness of claim 7 under 35 U.S.C. § 103 over Bowes, Datasheet, Artieri, and Christiansen;
4. Obviousness of claims 8 and 10 under 35 U.S.C. § 103 over Bowes, Datasheet, Artieri, Christiansen, and Arimilli;
5. Obviousness of claim 9 under 35 U.S.C. § 103 over Bowes, Datasheet, Artieri, Christiansen, and Shanley; and

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