

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Apple, Inc.
PETITIONERS

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'S PRELIMINARY RESPONSE
UNDER 37 C.F.R. §42.107**

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 a. The MPEG Standard Was Considered During the Prosecution of the `753 Patent6

 b. Artieri Mirrors the Implementation Identified as Prior Art by the `753 Patent7

 c. The combination of Bowes, Datasheet, Artieri and Arimilli does not disclose every element of claims 1 and 2 of the `753 Patent10

 i. The proposed combination does not disclose “providing access to the main memory for a request for access to the main memory when the arbiter circuit is in an idle state” [claim 1].....10

 ii. The proposed combination does not disclose wherein the video circuit/decoder is further configured to receive data from the [main] memory corresponding to at least one previously decoded [video] image [claim 2].....15

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