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: 2016-01134

Patent No. 7,542,045

Title: ELECTRONIC SYSTEM AND METHOD FOR DISPLAY USING A DECODER AND ARBITER TO SELECTIVELY ALLOW ACCESS TO A SHARED MEMORY

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



TABLE OF CONTENTS

I. INTRODUCTION	1
II. THE '045 PATENT	2
III. CLAIM CONSTRUCTION	3
IV. PETITIONER DOES NOT ESTABLISH A REASOLIKELIHOOD THAT ANY CHALLENGED CLAIM IS	
A. Ground 1: Bowes, Datasheet and Artieri (claims 1, 17)	
1. The MPEG Standard Was Considered During the 1 '045 Patent	
2. Artieri Mirrors the Implementation Identified as P Patent	•
3. The Combination of Bowes, Artieri and Datasheet Every Element of the Challenged Claims	
a. The proposed combination does not disclose the v receiving a previously decoded image from the [main	
b. The proposed combination does not disclose an araccess to the main/system memory	
4. No Motivation to Combine Bowes and Artieri	33
B. Ground 2: Bowes, Datasheet and Artieri in view of 23)	
V. CONCLUSION	48



TABLE OF AUTHORITIES

Cases C.R Bard, Inc. v. M3 Sys., Inc., In re Fine, In re Rambus Inc., In re Wilson, 424 F.2d 1382 1385 (CCPA 1970)......11 Karlin Tech., Inc. v. Surgical Dynamics, Inc., Kinetic Tech., Inc. v. Skyworks Solutions, Inc., IPR2014-00530, 2014 WL 4925282, (Patent Tr. & App. Bd. Sep. 29, 2014)34 KSR Int'l Co. v. Teleflex Inc., Phillips v. AWH Corp., Teleflex, Inc. v. Ficos N. America Corp., Toyota Motor Corp. v. Cellport Sys., Inc., Vivid Techs., Inc. v. Am. Sci. & Eng'g, Inc., 200 F.3d 795 (Fed. Cir. 1999)6



IPR2016-01134 Patent Owner Preliminary Response U.S. Patent No. 7,542,045

Rules

35 U.S.C.	§ 314(a)	1
37 C F R	8 42 5(b)	3



TABLE OF EXHIBITS

Exhibit	Exhibit Description	
No.		
2001	Claim Construction Memorandum Opinion and Order, <i>Parthenon</i>	
	Unified Memory Architecture, LLC v. Apple, Inc., Case No. 2:15-cv-	
	00225 (E.D. Tex.), Dkt No. 162	
2002	Brad Hansen, The Dictionary of Multimedia, 1997	
2003	Excerpts from Stone, H.S., High-Performance Computer Architecture,	
	Addison-Wesley Publishing Company, Reading, Massachusetts, 1993,	
	ISBN 0-201-52688-3.	
2004	Developer Note – Macintosh Quadra 840AV and Macintosh Centris	
	660AV Computers ("Quadra Developer Notes")	
2005	Institution Decision, IPR2015-01500 (U.S. Pat. No. 7,321,368)	
2006	Parthenon Unified Memory Architecture, LLC v. ZTE Corp., et al., Case	
	No. 2:15-cv-00225, Dkt No. 80	
2007	Parthenon Unified Memory Architecture, LLC v. Samsung Electronics	
	Co., Ltd., et al., Case No. 2:14-cv-00902, Dkt. No. 155	
2008	Parthenon Unified Memory Architecture, LLC v. HTC Corp., et al., Case	
	No. 2:14-cv-00690, Dkt. No. 155	
2009	Institution Decision, IPR2015-01502 (U.S. Pat. No. 7,542,045)	



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

