UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Apple, Inc.
PETITIONER

v.

Parthenon Unified Memory Architecture LLC
PATENT OWNER

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Case IPR2016-01135
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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TABLE OF AUTHORITIES

TABLE OF EXHIBITS

Exhibit No.	Exhibit Description
1001	U.S. Patent No. 5,812,789 ("`789 Patent")[1]
1005	U.S. Patent No. 5,546,547 ("Bowes")
1007	U.S. Patent No. 5, 001,625 ("Thomas")
2011	Declaration of Mitchell A. Thornton (Thornton Decl.")
2012	Deposition testimony of Robert Colwell, Ph.D dated February 27, 2017 ("Colwell Depo.").

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[1] Ex. 1001, 1005, and 1007 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. 5,812,789 ("`789 Patent") filed on June 2, 2016 and Decision Granting Institution of *Inter Partes Review* 37 C.F.R. 42.108 issued on December 6, 2016 ("Institution Decision").

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

1. Obviousness of claims 1–5 and 12–14 under 35 U.S.C. § 103 over Bowes, TMS, and Thomas;

2. Obviousness of claims 6 and 8 under 35 U.S.C. § 103 over Bowes, TMS, Thomas, and Gove;

3. Obviousness of claim 7 under 35 U.S.C. § 103 over Bowes, TMS, Thomas, and Ran; and

4. Obviousness of claim 11 under 35 U.S.C. § 103 over Bowes, TMS, Thomas, and Celi.

For the reasons discussed below, Bowes, TMS, and Thomas do not render claim 1 obvious. Because they depend on claim 1, claims 2–8 and 11–14 are

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