UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION, MICROSOFT MOBILE INC., SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG ELECTRONICS CO. LTD.

Petitioners

v.

FASTVDO LLC

Patent Owner

U.S. Patent No. 5,850,482

Issued: December 15, 1998

Application No.: 08/633,896

Filed: April 17, 1996

Title: Error Resilient Method And Apparatus For Entropy Coding

---

PETITION FOR *INTER PARTES* REVIEW OF
CLAIMS 1-3, 5-6, 12-14, 16-17, AND 28 OF U.S. PATENT NO. 5,850,482

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

Page(s)

TABLE OF CONTENTS i

TABLE OF AUTHORITIES vi

LIST OF EXHIBITS viii

I. INTRODUCTION 1

A. Mandatory Notices (37 C.F.R. § 42.8(b)) 1

1. Real Party-In-Interest (37 C.F.R. § 42.8(b)(1)) 1

2. Related Matters (37 C.F.R. § 42.8(b)(2)) 1

3. Lead And Backup Counsel (37 C.F.R. § 42.8(b)(3)) And Service Information 2

B. Proof Of Service (37 C.F.R. §§ 42.6(e) And 42.105(a)) 3

C. Fee For *Inter Partes* Review (37 C.F.R. § 42.15(a)) 3

D. Word Count Certification (37 C.F.R. § 42.24) 3

E. Grounds For Standing (37 C.F.R. § 42.104(a)) 3

II. CHALLENGE AND RELIEF REQUESTED (37 C.F.R. § 42.104(b)) 4

III. BACKGROUND AND STATE OF THE ART 5

A. Applicant's Admitted Prior Art 5

1. Entropy Coding Is Admitted Prior Art 5

2. Transforming Data Before Encoding Is Admitted Prior Art 7

3. Quantizing Transformed Data Before Entropy Encoding Is Admitted Prior Art 7

4. Providing Unequal Error Protection (UEP) To Subsets Varying In Importance Is Admitted Prior Art 8

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

5. Dividing Code Words Into A Prefix And A Suffix Field Is Admitted Prior Art 9

IV. OVERVIEW OF THE 482 PATENT 9

A. The 482 Patent Combines Known Techniques For Entropy Coding And Unequal Error Protection 9

B. Procedural History Of The 482 Patent 14

C. Representative Claims 15

V. IDENTIFICATION OF CHALLENGE (37 C.F.R. § 42.104(b)) 16

A. Claims For Which Review Is Requested (37 C.F.R. § 42.104(b)(1)) 16

B. Statutory Grounds For Challenge (37 C.F.R. § 42.104(b)(2)) 17

C. Claim Construction (37 C.F.R. § 42.104(b)(3)) 17

1. Level Of Ordinary Skill In The Art 18

2. Terms That Appear In All Claims 18

a. "code word" 18

b. "first portion of each code word" 19

c. "[associated] second portion of each code word" 20

VI. SUMMARY OF THE PRIOR ART TO THE 482 PATENT 21

A. Kato Combines Entropy Coding, Split Field Coding, And Unequal Error Protection 22

1. Kato Shows Combining Entropy Coding And Split Coding 23

2. Kato's Fourth Embodiment Shows Unequal Error Protection (UEP) For First And Second Code Word Portions 28

3. Kato's Third Embodiment Shows Encoding Data That Has Been Previously Transformed And Quantized 31

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

B. Wei Teaches Providing Different Transmission Channels ("Data Links") For Data Of Different Importance.....33

VII. EACH CHALLENGED CLAIM OF THE 482 PATENT IS UNPATENTABLE OVER KATO (37 CFR § 42.104(b)(4), 37 CFR § 42.104(b)(5))....36

A. Ground No. 1: Claims 1-3, 5, 12-14, 16 And 28 Are An Obvious Combination Of Kato's Embodiments 38

1. Motivation To Combine Kato's Embodiments.....38

2. Claim 1 And Its Dependents Are Obvious Over Kato 41

a. Kato Shows The Preamble 41

b. Kato Shows The "Generating A Plurality" Step 41

c. Kato Shows "Wherein Each Word Comprises…" 42

d. Kato Shows "Generating The First Portion" 43

e. Kato Shows "Generating The Second Portion" 45

f. Kato Shows "Providing Error Protection" 47

g. Kato Shows The Added Features Of Claim 2 48

h. Kato Shows Or Suggests The Added Features Of Claim 3.....49

i. Kato Shows Or Suggests The Added Features Of Claim 5.....50

3. Claim 12 And Its Dependents Are Obvious Over Kato 52

a. Kato Shows The Preamble 52

b. Kato Shows The "Transforming The Data" Step.....52

c. Kato Shows The "Quantizing The Data" Step 53

d. Kato Shows "Encoding The Quantized Data" 53

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

e. Kato Shows "Which Have Respective …" 54

f. Kato Shows "Including Information Within The First Portion".....54

g. Kato Shows "Including Information Within The Second Portion" 55

h. Kato Discloses "Providing Error Protection".....55

i. Kato Shows The Added Features Of Claim 13 55

j. Kato Shows Or Suggests The Added Features Of Claim 14.....56

k. Kato Shows Or Suggests The Added Features Of Claim 16.....56

4. Claim 28 Is Also Obvious Over Kato.....56

a. Kato Shows The Preamble 57

b. Kato Shows Or Suggests The "Partitioned Storage Medium" 57

c. Kato Shows "A Plurality Of Code Words" 58

d. Kato Shows Or Suggests Providing Unequal Error Protection For First And Second Portions 58

B. Ground No. 2: Claims 6 And 17 Are Obvious Over Kato In View Of Wei.....59

1. Motivation To Combine Kato With Wei 59

2. Wei Shows The Added Features Of Claim 6.....62

3. Wei Shows The Added Features Of Claim 17.....65

VIII. CONCLUSION.....65

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.