

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

Canon Inc., *et al.*,  
Petitioners

v.

Papst Licensing GMBH & CO. KG,  
Patent Owner

---

Case No: IPR2016-01211  
U.S. Patent No. 8,504,746

---

**PETITIONERS' REPLY TO PATENT OWNER RESPONSE**  
**OF MARCH 15, 2017**

## TABLE OF CONTENTS

	<b>Page</b>
I. Introduction.....	1
II. Kawaguchi In View Of Matsumoto Discloses Three Teachings That Would Have Motivated A POSITA To Use A File System.....	3
A. Kawaguchi’s Disclosure Of A Hard Disk Suggests Using A File System .....	3
B. Kawaguchi’s SDC Details Further Suggest Use Of A File System .....	6
C. Matsumoto Discloses Off-Host Storage Of Digitized Analog Data In A File System That Would Have Further Motivated A POSITA To Use A File System In Kawaguchi.....	9
III. Patent Owner’s Kawaguchi Interpretation Is Not The Way One Of Ordinary Skill In The Art Would Have Read Kawaguchi .....	11
IV. Patent Owner’s Complaints About A Kawaguchi System That Uses A File System Are Unfounded .....	14
A. Kawaguchi’s File System Does Not Result In A Conflict.....	14
B. Patent Owner’s Argument Regarding Loss Of Operating Speed Ignores The Primary Advantage Of Kawaguchi.....	15
C. Kawaguchi Teaches Communicating With Peripherals Via A SCSI Interface .....	17
V. Patent Owner’s Other Arguments Regarding The Independent Claims Are Also Unpersuasive.....	18
A. The Combination Of Kawaguchi And Matsumoto Includes A Processor That Implements A Data Generation Process .....	18
B. The Kawaguchi-Matsumoto Combination Includes The Processor Transferring At Least One File.....	20
C. The Proposed Combination Does Not Require Loading Of Any File Transfer Enabling Software .....	21
D. Patent Owner’s Arguments Regarding Independent Claims 31 And 34 Are Substantively Identical To Those Made For Claim 1 .....	21
VI. Patent Owner’s Dependent Claim Arguments Are Also Insufficient .....	22

**TABLE OF CONTENTS**  
(continued)

	<b>Page</b>
A. Claim 2 .....	22
B. Claims 7 and 26 .....	24
C. Claim 10 .....	25
D. Claim 19 .....	27
E. Claim 35 .....	28
VII. Conclusion .....	29

## TABLE OF AUTHORITIES

Page

### CASES

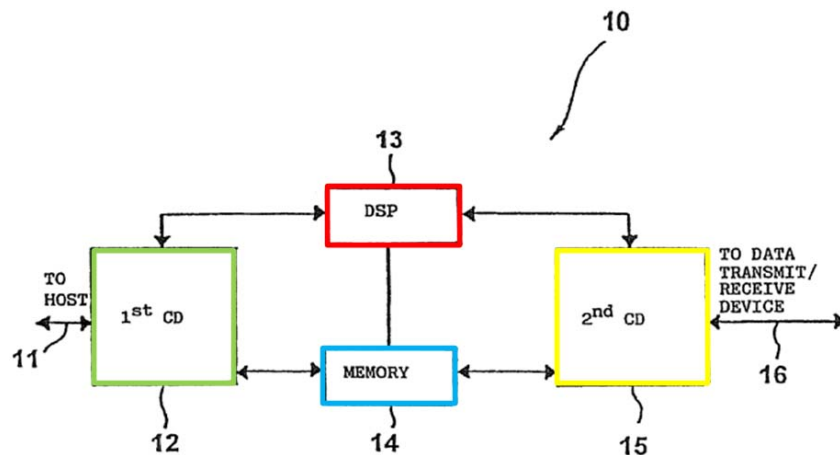
<i>Alarm.com Inc. v. Vivint, Inc.</i> , IPR2015-01965, Final Written Decision, Paper 36 (PTAB, Mar. 29, 2017) .....	4
<i>In re Preda</i> , 401 F.2d 825, 159 USPQ 342 (CCPA 1968).....	3, 4
<i>Plas-Pak Indus. v. Sulzer Mixpac AG</i> , 600 Fed. Appx. 755 (Fed. Cir. 2015).....	17
<i>Unified Patents Inc. v. Convergent Media Solutions, LLC</i> , IPR2016-00047, Final Written Decision, Paper 23 (PTAB, Mar. 29, 2017) .....	17

### OTHER AUTHORITIES

MPEP § 2112 .....	4
-------------------	---

## I. Introduction

Kawaguchi and the '746 patent address the same problem in nearly an identical manner. Both disclose an interface device having a data processor (red) and memory (blue) that connects peripheral devices of dissimilar types, via a connecting device (yellow), to a host system through a connecting device such as a SCSI interface (green). *See* Ex. 1201, '746 Patent, 1:63-2:5; Ex. 1207, Kawaguchi, 3:25-29.



*FIG. 1*

'746 Patent Fig. 1

# 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.