

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' RESPONSE TO PATENT OWNER'S ITEMIZED LISTING
OF AUGUST 9, 2017**

Pursuant to the Board's order (Paper 25), Petitioners submit the following:

	<u>Citation</u>	<u>Responsive To</u>	<u>Reply Supported By</u>
1	Reply, p. 4, l. 14- p. 5, l. 11.	Response, 19:15 - 20:14; Ex. 2008, ¶¶ 35, 36, 69.	Institution decision, 9; Petition, 20:12-21:17; Ex. 1204, ¶¶ 39, 48, 51, 113-117; Ex. 1204C, 30, 51, 54, 85, 93; Ex. 1216, 62:6-63:18.
2	Reply, p. 6, l. 17- p. 7, l. 7.	Response, 19:15 - 20:14; Ex. 2008, ¶¶ 35, 36, 69.	Petition, 20:12-21:17; Ex. 1204, ¶¶ 39, 48, 51, 113-117, 169, 181, FN3; Ex. 1204C, 86, 907-909.
3	Annotated FIG. 1, p. 8.	Response, 19:15 - 20:14; Ex. 2008, ¶¶ 35, 36, 69.	Petition, 20:12-18, 62:5-18; Ex. 1204, ¶¶ 115, 217-219.
4	Reply p. 8, lines 5-9.	Response, 19:15 - 20:14; Ex. 2008, ¶¶ 35, 36, 69.	Petition, 20:12-18, 62:5-18; Ex. 1204, ¶¶ 115, 217-219; Ex. 2011, 125:10-15.
5	Annotated FIG. 1, p. 9.	Response, 26:1-30:2; Ex. 2008, ¶¶ 52, 53, 57, 65, 70, 71, 92.	Petition, 13:1-10, 21:17-22:5; Ex. 1208, 3:20-22, 5:55-56; Ex. 1204, ¶¶ 117-118.
6	Reply, p. 9, lines 4-8.	Response, 26:1-30:2; Ex. 2008, ¶¶ 52, 53, 57, 65, 70, 71, 92.	Petition, 13:1-10, 21:17-22:5; Ex. 1208, 3:20-22, 5:55-56; Ex. 1204, ¶¶ 117-118; Ex. 2011, 125:10-15.
7	Reply, p. 9, l. 12- p. 10, l. 6.	Response, 26:1-30:2; Ex. 2008, ¶¶ 52, 53, 57, 65, 70, 71, 92.	Petition, 13:1-10, 21:17-22:5; Ex. 1208, 3:20-22, 5:55-56; Ex. 1204, ¶¶ 56, 117-118.

8	Reply, p. 10, l. 15- p. 11, l. 8.	Response, 26:1-30:2; Ex. 2008, ¶¶ 52, 53, 57, 65, 70, 71, 92.	Petition, 13:1-10; 21:17-22:5; Ex. 1208, 3:20-22, 5:55-56; Ex. 1204, ¶¶ 56, 117-118; Ex. 2011, 125:10-15.
9	Reply, p. 12, l. 7- p. 13, l. 6.	Response, 22:14-23:11; Ex. 2008, ¶¶ 66, 67.	Ex. 2011, 125:10-15.
10	Reply, p. 13, lines 7-18.	Response, 22:14-23:11; Ex. 2008, ¶¶ 66, 67.	Petition, 20:12-18, 62:5-18; Ex. 1204, ¶¶ 115, 217-219; Ex. 2011, 125:10-15.
11	Reply, p. 14, lines 8-15.	Response, 22:14-23:11; Ex. 2008, ¶¶ 66, 67.	Matsumoto: Petition, 13:1-10, 21:17-22:5; Ex. 1208, 3:20-22, 5:55-56; Ex. 1204, ¶¶ 37, 117-118; Ex. 2011, 125:10-15. MS-DOS Encyclopedia: Petition, 20:12-21:17; Ex. 1204, ¶¶ 48, 51, 113-117, 169, 181, FN3; Ex. 1204C, 86, 907-909.
12	Reply, p. 26, l. 12- p. 27, l. 1.	Response, 44:11-45:9; Ex. 2008, ¶ 89.	Ex. 1216, 75:22-76:9; Ex. 2011, 125:10-15; Petition, 34:1-35:5, 61:15-62:19; Ex. 1204, ¶¶ 158-159, 217-219.
13	Reply, p. 28, l. 14- p. 29, l. 5.	Response, 47:15-48:18; Ex. 2008, ¶¶ 94-96.	Ex. 1216, 75:22-76:9. Petition, 13:1-10, 21:17-22:5, 34:1-35:5, 61:15-62:19; Ex. 1204, ¶¶ 56, 158-159, 217-219.
14	Exhibits 1217-1218.	Response, 19:15 - 20:14; Ex. 2008, ¶¶ 35, 36, 69.	1217: Petition, 19:8-22:5. 1218: Institution Decision, 9; Ex. 1204, ¶¶ 39; Ex. 1216, 62:6-63:18.

Respectfully submitted,

Dated: August 16, 2017

By: / David M. Maiorana /

David M. Maiorana
Attorney for Canon Inc.,
Canon USA, Inc., and Canon Financial
Services, Inc. and, pursuant to 37 C.F.R.
§ 42.8(b)(3), Lead Counsel for Petitioners

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Petitioners' Response to Patent Owner's Itemized Listing was served on August 16, 2017, by email to the following address:

ntpete@fitcheven.com

phenkelmann@fitcheven.com

jmarinelli@fitcheven.com

nlittle@fitcheven.com

ameola@iplawusa.com

PapstIPR@fitcheven.com

Dated: August 16, 2017

By: / Matthew W. Johnson /