

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANON INC.; CANON USA, INC.;
CANON FINANCIAL SERVICES, INC.; FUJIFILM CORPORATION;
FUJIFILM HOLDINGS AMERICA CORPORATION;
FUJIFILM NORTH AMERICA CORPORATION; JVC KENWOOD
CORPORATION; JVCKENWOOD USA CORPORATION;
NIKON CORPORATION; NIKON INC.; OLYMPUS CORPORATION;
OLYMPUS AMERICA INC.; PANASONIC CORPORATION;
PANASONIC CORPORATION OF NORTH AMERICA;
SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.
Petitioners,

v.

PAPST LICENSING GMBH & CO. KG
Patent Owner.

Case IPR2016-01211
Patent 8,504,746

**PAPST LICENSING GMBH & CO. KG'S
PRELIMINARY RESPONSE**

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Patent Trial and Appeal Board
United States Patent and Trademark Office
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(i) Fourth Element: “wherein the processor is configured and programmed to implement a data generation process by which analog data is acquired from the	

analog signal acquisition channel, the analog data is processed and digitized, and the processed and digitized analog data is stored in a file system of the data storage memory as at least one file of digitized analog data” 28

(ii) Sixth element, second part: “whereby there is no requirement for any user-loaded file transfer enabling software to be loaded on or installed in the computer in addition to the operating system” 30

(iii) Sixth element, first part: “wherein the processor is further configured and programmed to execute at least one other instruction set stored in the program memory to thereby allow the at least one file of digitized analog data acquired from the analog signal acquisition channel to be transferred to the computer using the device driver corresponding to said class of devices so that the analog data acquisition device appears to the computer as if it were a device of the class of devices” 34

2. Independent Claim 31 37

(i) Second element: “wherein the processor is configured to control a data generation process by which analog data is acquired from the analog source, the analog data is processed and digitized, and the processed and digitized analog data is stored in the memory as digitized analog data;” 37

(ii) Fourth element: “wherein the processor is configured to automatically transfer

the digitized analog data acquired from the analog source to the host device in response to a digital mass storage device data read signal from the host device, in a manner that causes the analog data acquisition and interface device to appear to be the mass storage device, while using the device driver associated with the mass storage device to perform the automatic transfer without requiring any user-loaded file transfer enabling software to be loaded on or installed in the computer” 37

3. Independent Claim 34 38

(i) Second element: “acquiring analog data from an analog source, processing and digitizing the analog data, and storing the processed and digitized analog data in the memory as digitized analog data under control of the processor” 38

(ii) Fourth element: “automatically transferring data from the analog source to the host device in response to a digital data read command from the host device, in a manner that causes the analog data acquisition device to appear to be a digital device instead of as an analog data acquisition device, while using the device driver to perform the automatic transfer of the acquired digitized analog data to the host device without requiring any user-loaded file transfer enabling software to be loaded on or installed in the host device” 39

C. Petitioners Fail to Articulate a Proper Obviousness
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