

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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.;  
SAMSUNG ELECTRONICS AMERICA, INC., AND LG ELECTRONICS, INC.,  
Petitioner,

v.

PAPST LICENSING GMBH & CO. KG  
Patent Owner.

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Case IPR2016-01213  
Patent 8,504,746

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**PAPST LICENSING GMBH & CO. KG'S ITEMIZED LISTING OF  
OBJECTIONABLE ARGUMENTS AND EVIDENCE FILED WITH  
PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

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Patent Trial and Appeal Board  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

Pursuant to the Board's Order (Paper 23), Patent Owner submits the following listing of Petitioner's improper reply arguments and evidence:

- **Ex. 1313 at 1:15–19:** “A POSITA would have understood that . . . the SCC 20 would output control signals to control the operation of interface circuit 65 and R/D control circuit 66 . . . .” (*See also Reply at 9:9-12.*)
- **Ex. 1313 at 2:1–8:** “A POSITA would have also understood that when in external hard disk mode, SCC 20 would prevent other circuits of the camera from accessing hard disk 71. . . .” (*See also Reply at 9:15–10:4.*)
- **Ex. 1313 at 2:8–15:** “Additionally, a POSITA would have understood that SCC20 would also prevent other camera circuits from . . . .” (*See also Reply at 9:15–10:11*)
- **Ex. 1313 at 2:15–3:3:** “A POSITA would have understood that SCC 20 . . . manages the different camera operation modes . . . .” and “would therefore have understood that Yamamoto's SCC 20 controls data transfer . . . .” (*See also Reply at 10:12–14.*)
- **Ex. 1313 at 3:13–4:6:** “At the priority dates of the Tasler patents . . . a POSITA would have known and understood that a broad set of microcomputers and microprocessors . . . and that even ales powerful microcomputers and microprocessors . . . would have been fully capable . . . .” (*See also Reply at 11:12–20.*)

- **Ex. 1313 at 4:7–19:** “A POSITA would have known that . . . many low power processors available . . . could have performed this command processing . . .” (*See also Reply at 11:14–20.*)
- **Ex. 1313 at 5:1–14:** “. . . a POSITA would have understood that data passing between the Yamamoto storage medium and an external computer from the image recording device 67, through the R/D control circuit 66, would be initiated and controlled by SCC 20, and the data itself may pass through SCC 20. . . .” (*See also Reply at 19:9–20:9.*)
- **Ex. 1313 at 5:18–6:7:** “. . . [a] POSITA would have understood that SCC 20 would exercise this timing control in order to manage possibly different data flow rates between the storage medium, the external computer, and logic along that path (e.g. R/D control circuit 66 and interface circuit 65).” (*See also Reply at 19:9–20:9.*)
- **Ex. 1313 at 6:8–11:** “A POSITA would also have understood . . . that the processors available to implement Yamamoto’s SCC would have been fully capable of supporting the file transfer process . . . .” (*See also Reply at 16:15–21.*)
- **Ex. 1313 at 7:12–17:** “. . . [a] POSITA would have understood that the file system on Yamamoto’s hard drive may differ in accordance with what the external computer expects to find. It would be up to the end user to determine which operating system and file system its external computer uses, and to purchase pre-formatted disks that comport with that operating systems’ requirements.” (*See also Reply at 23:4–12.*)

Respectfully submitted,

Dated: August 9, 2017

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on August 9, 2017, a complete and entire copy of **PAPST LICENSING GMBH & CO. KG'S ITEMIZED LISTING OF OBJECTIONABLE ARGUMENTS AND EVIDENCE FILED WITH PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE** has been served in its entirety by e-mail on the following addresses of record for Petitioner:

PapstPTABPetitioners@Jonesday.com

Dated: August 9, 2017

By: /Nicholas T. Peters/  
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