

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

LIMESTONE MEMORY SYSTEMS LLC,
Patent Owner.

Case IPR2016-01561
U.S. Patent No. 6,233,181

PETITION FOR *INTER PARTES* REVIEW

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Patent Trial and Appeal Board
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P.O. Box 1450
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1.	Sukegawa, Fujishima, and Walck disclose and render obvious every limitation of dependent claim 5.....	64
2.	A person of ordinary skill in the art would have been motivated to combine the teachings of Sukegawa, Fujishima, and Walck, thereby rendering claim 5 obvious.....	70
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TABLE OF EXHIBITS

Exhibit #	Exhibit Description
1001	Declaration of Dr. Pinaki Mazumder
1002	Curriculum Vitae of Dr. Pinaki Mazumder
1003	U.S. Patent No. 6,233,181
1004	File History for U.S. Patent No. 6,233,181
1005	U.S. Patent No. 5,487,040 to Sukegawa
1006	U.S. Patent No. 5,267,214 to Fujishima
1007	U.S. Patent No. 4,967,397 to Walck
1008	U.S. Patent No. 5,956,285 to Watanabe
1009	Masashi Horiguchi et al., <i>A Flexible Redundancy Technique for High-Density DRAM's</i> , IEEE JOURNAL OF SOLID-STATE CIRCUITS, VOL. 26, NO. 1, Jan. 1991, at 12-17
1010	Kazutami Arimoto et al., <i>A 60-ns 3.3-V-Only 16 Mbit DRAM with Multipurpose Register</i> , IEEE JOURNAL OF SOLID-STATE CIRCUITS, VOL. 24, NO. 5, Oct. 1989, at 1184-90
1011	U.S. Patent No. 5,687,123 to Hidaka
1012	U.S. Patent No. 5,726,946 to Yamagata
1013	U.S. Patent No. 6,003,148 to Yamauchi
1014	U.S. Patent No. 6,075,743 to Barth
1015	<i>Inter Partes</i> Review No. IPR2016-00096, Decision Granting Institution filed April 21, 2016
1016	<i>Inter Partes</i> Review No. IPR2016-00096, Judgment Granting Request for Adverse Judgment filed August 3, 2016

Apple, Inc. (“Apple”) hereby petitions under 35 U.S.C. §§ 311-319 and 37 C.F.R., Part 42 for *Inter Partes* Review (“IPR”) of claims 3 and 5 (“the Challenged Claims”) of U.S. Patent No. 6,233,181 (the “’181 patent”) (Ex. 1003), filed on February 17, 1999. The ’181 patent issued on May 15, 2001, to Hideto Hidaka, and is assigned to Limestone Memory Systems LLC (“LMS” or “Patent Owner”), according to USPTO assignment records. There is a reasonable likelihood that Petitioner will prevail with respect to at least one Challenged Claim.

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)

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

Petitioner Apple is the real party-in-interest. No other party exercised or could have exercised control over this petition; no other parties funded or directed this petition. (*See* Office Patent Practice Trial Guide, 77 Fed. Reg. 48750-60.)

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

The ’181 patent and U.S. Patent Nos. 5,805,804, 5,894,441, and 6,697,296 (collectively, “the asserted patents”) are being asserted by Limestone against Apple in the pending litigation (currently stayed), *Limestone Memory Sys. LLC v. Apple Inc.*, 8:15-cv-01274, filed on August 10, 2015, in the U.S. District Court for the Central District of California (“C.D. Cal”). In addition to the foregoing litigation, LMS has also asserted one or more of the asserted patents in the following actions: *Limestone Memory Sys. LLC v. Micron Tech. Inc.*, 8:15-cv-00278; *Limestone*

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