UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC., Petitioner,
V.
LIMESTONE MEMORY SYSTEMS LLC, Patent Owner.
Case IPR2016-01567 U.S. Patent No. 5,894,441

DECLARATION OF DR. PINAKI MAZUMDER IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW



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C.		a in view of Horiguchi Discloses Each of the tations of Claims 8 and 1012	:6
	1.	Gallia and Horiguchi disclose every limitation of dependent claim 8	
	2.	Gallia and Horiguchi disclose every limitation of dependent claim 10	.7
	3.	A person of ordinary skill in the art would have been motivated to combine the teachings of Gallia and Horiguchi, rendering	1
		claims 8 and 10 obvious	.s 13



EXHIBITS

Exhibit #	Exhibit Description
1001	Declaration of Dr. Pinaki Mazumder
1002	Curriculum Vitae of Dr. Pinaki Mazumder
1003	U.S. Patent No. 5,894,441
1004	File History for U.S. Patent No. 5,894,441
1005	U.S. Patent No. 5,265,055 to Horiguchi
1006	U.S. Patent No. 5,126,973 to Gallia
1007	Inter Partes Review No. IPR2016-00094, Petition for Inter Partes Review filed October 27, 2015 (without exhibits)
1008	U.S. Patent No. 5,270,975 to McAdams
1009	Japanese Patent Appl. No. H06-052696 to Minami
1010	Inter Partes Review No. IPR2016-00094, Patent Owner's Preliminary Response filed January 27, 2016
1011	Inter Partes Review No. IPR2016-00094, Decision Denying Institution filed April 12, 2016
1012	U.S. Patent No. 5,956,285 to Watanabe
1013	Masashi Horiguchi et al., <i>A Flexible Redundancy Technique for High-Density DRAMs</i> , IEEE JOURNAL OF SOLID-STATE CIRCUITS, Vol. 26, No. 1, Jan. 1991, at 12-17
1014	U.S. Patent No. 5,267,214 to Fujishima
1015	U.S. Patent No. 5,349,556 to Lee
1016	U.S. Patent No. 5,355,339 to Oh
1017	U.S. Patent No. 5,359,560 to Suh
1018	U.S. Patent No. 5,798,974 to Yamagata



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