

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KINGSTON TECHNOLOGY COMPANY, INC.,

Petitioner

v.

POLARIS INNOVATIONS LTD.,

Patent Owner

Case No. IPR2016-01622

Patent 6,850,414

PETITION FOR *INTER PARTES* REVIEW OF

U.S. PATENT NO. 6,850,414

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EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent 6,850,414 to Benisek ('414 patent)
1002	UK Patent Application GB 2 289 573 A to Simpson
1003	PC SDRAM Unbuffered DIMM Specification, Version 1.0
1004	U.S. Patent Application Publication No. 2002/0196612 to Gall
1005	PC133 SDRAM Registered DIMM Design Specification
1006	Declaration of Professor Vivek Subramanian ("Subramanian")
1007	'414 Patent File History
1008	File History for U.S. Patent No. 6,332,183
1009	District Court Complaint
1010	Professor Vivek Subramanian's <i>Curriculum Vitae</i>

I. INTRODUCTION AND RELIEF REQUESTED

Kingston Technology Company, Inc. (“Petitioner”) hereby petitions for institution of *inter partes* review of all claims of U.S. Patent No. 6,850,414 (the “’414 Patent”) (Ex. 1001). The ’414 Patent issued on February 1, 2005. Polaris Innovations Limited (“Patent Owner”) is the assignee of record with the United States Patent & Trademark Office (“USPTO”). Petitioner respectfully requests cancellation of claims 1-8 of the ’414 Patent on the grounds of unpatentability herein. The prior art and other evidence offered with this Petition—which were not before the USPTO during original prosecution—establish that all elements in the challenged claims of the ’414 Patent were well known prior to the earliest alleged priority date, and that the claimed methods and systems recited in the ’414 Patent are invalid as obvious under 35 U.S.C. § 103.

II. GROUNDS FOR STANDING

Petitioner certifies that the ’414 Patent is available for review under 35 U.S.C. § 311(c) and that Petitioner is not estopped from requesting an *inter partes* review challenging claims 1-8 on the grounds identified herein.

III. MANDATORY NOTICES

Real Party in Interest: Petitioner Kingston Technology Company, Inc.

Related Matters: The Patent Owner alleges infringement of the ’414 Patent in the parallel litigation styled *Polaris Innovations Ltd. v. Kingston Tech. Co., Inc.*, Case No. 8:16-cv-300 (C.D. Cal.), filed February 19, 2016 (“Co-Pending District

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