

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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KINGSTON TECHNOLOGY COMPANY, INC.,

Petitioner

v.

POLARIS INNOVATIONS LTD.,

Patent Owner

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Case No. IPR2017-00974

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Patent 6,850,414

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PETITION FOR *INTER PARTES* REVIEW OF

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

Mail Stop **Patent Board**  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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B. Bechtolsheim in combination with Tokunaga and Karabatsos, renders obvious all elements of Claim 4 4 of the '414 Patent.....39

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**EXHIBIT LIST**

<b>Exhibit</b>	<b>Description</b>
1001	U.S. Patent 6,850,414 to Benisek ('414 patent)
1002	UK Patent Application GB 2 289 573 A to Simpson
1003	U.S. Patent Application Publication No. 2002/0006032 to Karabatsos
1004	U.S. Patent No. 5,973,951 to Bechtolsheim
1005	U.S. Patent No. 6,038,132 to Tokunaga
1006	Declaration of Professor Vivek Subramanian ("Subramanian")
1007	'414 Patent File History
1008	PC133 SDRAM Registered DIMM Design Specification
1009	District Court Complaint with Proof of Service Executed and filed by Plaintiff
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 claim 4 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 claim 4 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 claim 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. GROUND 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 claim 4 on the grounds identified herein.

Petitioner certifies that the ’414 Patent is available for IPR. The present petition is being filed within one year of service of a complaint against Kingston Technology Company, Inc. in Civil Action No. 8:16-cv-300, filed February 19, 2016 in the Central District of California. Petitioner is not barred or estopped from

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