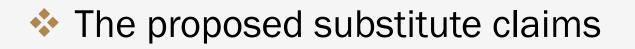
IPR2016-01737 & IPR2016-01738 Apple Inc. v. Realtime Data LLC Patent 8,880,862 Motions to Amend

Served December 29, 2017 Presented January 8, 2018

Argument Roadmap



- Patent Owner has met its burden
- Apple must prove unpatentability
- Apple alleges four obviousness theory
- Each of Apple's theories fails



The proposed substitute claims

- Patent Owner has met its burden
- Apple must prove unpatentability
- Apple alleges four obviousness theory
- Each of Apple's theories fails

Proposed Substitute Claims

Claims 118, 122, 124 and dependents Four new limitations:

- "preloading" compressed boot data, rather than simply "loading" the boot data;
- preloading into a "volatile memory" rather than a "memory";
- "preloading" comprises
 "transferring the portion of boot data in the compressed form into the volatile memory";
- 4. preloading occurs "during the same boot sequence in which a boot device controller receives a command over a computer bus to load the portion of boot data."

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Claim 174, 177, 179 and Three new limitations:

- "preloading" compre data, rather than sim the boot data;
- preloading by "transf portion of the operat from a first memory to memory";
- preloading occurs "d same boot sequence boot device controlle command over a con load the portion of th system."

Proposed Substitute Claims

118. (Substitute for claim 1, if found unpatentable) A method for provie accelerated loading of an operating system in a computer system, the comprising:

- preloading a portion of boot data in a compressed form <u>into a volatil</u> the portion of boot data in the compressed form being associated a portion of a boot data list for booting the computer system into a wherein the preloading comprises transferring the portion of boot compressed form into the volatile memory, and wherein the preloa during the same boot sequence in which a boot device controller command over a computer bus to load the portion of boot data;
- accessing the <u>pre</u>loaded portion of the boot data in the compressed the <u>volatile</u> memory;
- decompressing the accessed portion of the boot data in the compre a rate that decreases a boot time of the operating system relative the operating system utilizing boot data in an uncompressed form updating the boot data list, wherein the decompressed portion of bo comprises a portion of the operating system.

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