UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC., Petitioner,
V.
REALTIME DATA LLC, Patent Owner.
Case IPR2016-01737 Patent 8 880 862

PETITIONER'S SUPPLEMENTAL BRIEF IN OPPOSITION TO PATENT OWNER'S MOTION TO AMEND



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I.	Sukegawa and Dye, Further Combined with either of Esfahani or Kroeker,
	Render Obvious the Substitute Claims 1
II.	Settsu, Both Alone and in Combination with Zwiegincew, Renders Obvious the Substitute Claims
Ш	Conclusion



UPDATED EXHIBIT LIST

APPLE-1001	U.S. Patent No. 8,880,862 to Fallon, et al. ("the '862 patent")
APPLE-1002	Excerpts from the Prosecution History of the '862 Patent ("the Prosecution History")
APPLE-1003	Declaration of Dr. Charles J. Neuhauser ("Dec.")
APPLE-1004	Curriculum Vitae of Dr. Charles J. Neuhauser
APPLE-1005	U.S. Patent No. 5,860,083 ("Sukegawa")
APPLE-1006	U.S. Patent No. 6,374,353 ("Settsu")
APPLE-1007	Burrows et al., "On-line Data Compression in a Log-structured File System" (1992) ("Burrows")
APPLE-1008	U.S. Patent No. 6,145,069 ("Dye")
APPLE-1009	U.S. Patent No. 7,190,284 ("Dye '284")
APPLE-1010	U.S. Patent No. 6,317,818 ("Zwiegincew")
APPLE-1011	Jeff Prosise, DOS 6 – The Ultimate Software Bundle?, PC MAGAZINE, Apr. 13, 1993 ("Prosise")
APPLE-1012	Excerpts from John L. Hennessey & David A. Patterson, Computer Architecture a Quantitative Approach (1st ed. 1990) ("Hennessey")
APPLE-1013	(RESERVED)
APPLE-1014	File, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1015	Excerpts from Tom Shanley & Don Anderson, <i>PCI System Architecture</i> , (4th ed. 1999) ("Shanley")



	Audilley Docker. 39321-00231F1
APPLE-1016	Jacob Ziv & Abraham Lempel, A Universal Algorithm for
	Sequential Data Compression, IT-23 No. 3 IEEE
	Transactions on Information Theory 337 (1977)("Ziv")
APPLE-1017	James A. Storer & Thomas G. Szymanski, Data Compression
	via Textual Substitution, 19 No. 4 JOURNAL OF THE
	ASSOCIATION FOR COMPUTING MACHINERY (1982)("Storer")
APPLE-1018	Program File, Microsoft Press Computer Dictionary (3d ed.
711 1 LL 1010	1997)
	1997)
APPLE-1019	Direct Memory Access, Microsoft Press Computer Dictionary
AIILE-1019	(3d ed. 1997)
	(3d ed. 1997)
APPLE-1020	DAM and DAM Cache Microsoft Duese Commuter Distinguis
APPLE-1020	RAM and RAM Cache, Microsoft Press Computer Dictionary
	(3d ed. 1997)
A DDI E 1021	
APPLE-1021	Decoder, Microsoft Press Computer Dictionary (3d ed. 1997)
A DDI E 1022	(DEGEDIJED)
APPLE-1022	(RESERVED)
A DDI E 1022	
APPLE-1023	Excerpts from Kyle Loudon, Mastering Algorithms with C
	(1999) ("Loudon")
4 DDI E 1004	
APPLE-1024	Excerpts from Michael Barr, Programming Embedded Systems
	in C and C++ (1999) ("Barr")
APPLE-1025	Excerpts from Eric Pearce, Windows NT in a Nutshell (1999)
	("Pearce")
APPLE-1026	Excerpts from Tim O'Reilly, Troy Mott, and Walter Glenn,
	Windows NT in a Nutshell (1999) ("O'Reilly")
APPLE-1027	Cache, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1028	Declaration of Michael Bittner in support of Petitioner's Motion
	for Pro Hac Vice Admission



	Thermey Booken 39321 002211 1
APPLE-1029	RESERVED
APPLE-1030	Second Declaration of Dr. Charles Neuhauser
APPLE-1031	U.S. Patent No. 6,117,187 ("Staelin")
APPLE-1032	U.S. Patent No. 5,625,809 ("Dysart")
APPLE-1033	U.S. Patent No. 5,590,331 ("Lewis")
APPLE-1034	Directory, The Dictionary of Computing & Digital Media (1999)
APPLE-1035	Directory, Prentice Hall's Illustrated Dictionary of Computing (Third Edition, 1998)
APPLE-1036	U.S. Patent No. 5,915,252 ("Misheski")
APPLE-1037	U.S. Patent No. 5,809,295 ("Straub")
APPLE-1038	U.S. Patent No. 6,633,968 ("Zwiegincew '968")
APPLE-1039	Defendant Apple Inc.'s Invalidity Contentions, Case No. 4:16-cv-02595-JD (N.D. Cal.)
APPLE-1040	Transcript of June 20, 2017 Deposition of Dr. Back
APPLE-1041	Encoder, Microsoft Press Computer Dictionary (5th ed. 2002)
APPLE-1042	Encoder, The Computer Desktop Encyclopedia (2nd ed. 1999)
APPLE-1043	Third Declaration of Dr. Charles Neuhauser



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