UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
APPLE INC., Petitioner,
v.
REALTIME DATA LLC, Patent Owner.
Case IPR2016-01739 Patent 8,880,862

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



TABLE OF CONTENTS

I.	Introduction		
II.	Claim Construction		
	A. Boot Data List1		
	B. Non-Accessed Boot Data5		
III.	The Applied Prior Art Renders "Updating the Boot Data List" Obvious7		
	A. Settsu Renders Obvious "Updating the Boot Data List" (All Claims)		
	7		
	B. Settsu in view of Zwiegincew Also Describes "Updating the Boot Data		
	List" (All Claims)		
IV.	The Applied Prior Art Renders Obvious "Disassociating Non-Accessed Boot		
	Data from the Boot Data List" (Claim 98)		
V.	The Applied Prior Art Renders Obvious "Updating the Boot Data List" in		
	Response to the "Utilizing" Step (Claim 112)20		
VI.	Each of Settsu, Alone and in Combination with Dye and/or Zwiegincew		
	Renders Obvious "a Plurality of Encoders" (Claim 46)21		
VII.	The IPR is Constitutional		
VIII.	Conclusion		



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	(RESERVED)
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	U.S. Patent No. 6,158,000 ("Collins")
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")



	Attorney Docket. 37321-002311 S
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, <i>Data Compression via Textual Substitution</i> , 19 No. 4 JOURNAL OF THE ASSOCIATION FOR COMPUTING MACHINERY (1982)("Storer")
APPLE-1018	Program File, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1019	Direct Memory Access, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1020	RAM and RAM Cache, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1021	Decoder, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1022	(RESERVED)
APPLE-1023	Excerpts from Kyle Loudon, <i>Mastering Algorithms with C</i> (1999) ("Loudon")
APPLE-1024	Excerpts from Michael Barr, <i>Programming Embedded Systems</i> 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	(RESERVED)
APPLE-1028	Declaration of Michael Bittner in support of Petitioner's Motion for Pro Hac Vice Admission



	Attorney Docket. 39321-002311 3
APPLE-1029	(RESERVED)
APPLE-1030	(RESERVED)
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	Header, Microsoft Press Computer Dictionary (3d ed. 1997)
APPLE-1044	Access, Microsoft Press Computer Dictionary (3d ed. 1997)



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

