

APPLE INC. Petitioner,

v.

PAPST LICENSING GMBH & CO. KG Patent Owner

Case IPR2016-01839 Patent 6,470,399

PETITIONER APPLE INC.'S REPLY TO PATENT OWNER'S RESPONSE

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I.	Claim Construction.			
	A.	The word "an" in the phrase "it is an input/output device customary in a host device" means "one or more."		
	B.	The word "it" in the phrase "it is an input/output device customary in a host device" refers to the device inquired by the host device.		
	C.	The "/" in the term "input/output device" means "and/or."		
II.	The combination of Kawaguchi and Schmidt discloses the disputed "wherein" limitations of the independent claims.			
	A.	Kawaguchi's four units are each identified as disk drives in response to separate SCSI INQUIRY commands		
	B.	Kawaguchi's units, in combination with the SCSI details of Schmidt, disclose the inquiry response recited in the '399 claims14		
III.	PO's	PO's arguments have no merit		
	A.	PO's arguments regarding an allegedly missing limitation are based on technical inaccuracies having no support in the record1		
		1. PO's "read-only" argument mischaracterizes the prior art and is contrary to the explicit language of the claims		
		2. PO's "single device" argument is based on an inaccurate reading of the claims		
	B.	A POSITA would have combined Kawaguchi and Schmidt23		
	C.	PO does not separately argue patentability of dependent claims 3 and 5		
IV.	PO's arguments do not rely on translation differences			
V.	PO's belief of unconstitutionality is not a request for relief26			
VI.	Conclusion			



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EXHIBIT LIST

Ex. No.	Description
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1002	File History for U.S. Patent 6,470,399
1003	Declaration of Dr. Erez Zadok in Support of Petition for Inter Partes
	Review of U.S. Patent No. 6,470,399
1004	Curriculum Vitae of Dr. Erez Zadok
1005	Japanese Patent Application Publication H4-15853 to Kawaguchi et
	al. (English Translation) ("Kawaguchi")
1006	Japanese Patent Application Publication H4-15853 to Kawaguchi et
	al. (Original Japanese)
1007	The SCSI Bus and IDE Interface Protocols, Applications and
	Programming, by Schmidt, First Edition, Addison-Wesley, 1995
1008	U.S. Patent No. 5,506,692 to Murata
1009	U.S. Patent No. 4,727,512 to Birkner
1010	U.S. Patent No. 4,792,896 to Maclean
1011	International Publication Number WO 92/21224 to Jorgensen
1012	Small Computer System Interface-2 (SCSI-2), ANSI X3.131-1994,
	American National Standard for Information Systems (ANSI).
1013	Operating System Concepts, by Silberschatz et al., Fourth Edition.
1014	Microsoft Computer Dictionary, Third Edition, Microsoft Press,
	1997.
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	Edition, McGraw-Hill, 1994.
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1018	The IEEE Standard Dictionary of Electrical and Electronics Terms,
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1020	Language, Random House, 1996.
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1022	"Principles of Data Acquisition and Conversion," Intersil Application
	Note, October 1986.



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	2009.
1024	Declaration of Scott Bennett
1025	Discrete-Time Signal Processing, by Oppenheim et al., First Edition,
	Prentice-Hall, 1989.
1026-1030	Intentionally left blank
1031	Plug-and-Play SCSI Specification, Version 1.0, dated March 30,
	1994 ("PNP SCSI")
1032	Supplemental Declaration of Dr. Erez Zadok in Support of Reply for
	Inter Partes Review of U.S. Patent No. 6,470,399
1033	Transcript of Deposition of Mr. Gafford
1034	U.S. Patent No. 5,089,958 to Horton <i>et al</i> .



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