

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner,

v.

PAPST LICENSING GMBH & CO. KG
Patent Owner

Case IPR2016-01839
Patent 6,470,399

**PETITIONER APPLE INC.'S
RESPONSIVE ITEMIZED LISTING**

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

1. Responsive to: POR, 22:13–23:15 (“It is illogical in the context of the ’399 Patent to interpret the claim language for ‘it is an input/output device’ to mean ‘it is one or more input or output devices’ as well as inconsistent with the district court’s claim construction in the underlying district court case”); Gafford, ¶¶54–55; Supported by: Petition, 9:8–10 (“the terms are to be given their plain and ordinary meaning”).
2. Responsive to: POR, 13:11–16; 15:8–19; (“Kawaguchi’s teaching of separate reading and writing units having different IDs is critical to his invention”); 27:20–28:13 (“each data writing unit or reading unit... has its own device ID”); Supported by: Petition 43:2–4.
3. Responsive to: POR, 24:6–12; 27:20–28:13 (“SCSI inquiry and responses are made at a given device ID.... [The] data reading unit... has its own device ID”); 20:12–14 (“Kawaguchi’s device could only, at best, signal to the host device that any of its IDs is a hard disk device, but one that can only be read or written.”); Gafford, ¶¶51–53, 74 (“not mandatory for a SCSI target... to respond with inquiry data”); Supported by: Petition, 43:2–44:4 (“[Kawaguchi’s] data transfer enables... writ[ing] or read[ing] data to each writing unit or from each reading unit using the same method as that for four hard disks”); Zadok, ¶90 (“INQUIRY command ‘[r]eturns LUN specific information.’”); ¶98 (“INQUIRY command ‘can be used to learn... the device type’”).

4. Same as 3, and also *Supported by*: Petition, 33:12–34:6 and figure on p. 34; Zadok, ¶66 (“Schmidt provides the details of this identification (citing Schmidt Table 12.1)); ¶67 (“a device provides, among other parameters, its device class, which can include the disk drive class”); ¶¶108, 111.
5. Same as 3, and also *Supported by*: Zadok ¶108.
6. Same as 1.
7. Same as 5.
8. *Responsive to*: POR, 28:8–13 (“it would render the Kawaguchi invention inoperable if the interface device of Kawaguchi responded to any Inquiry... by saying the device at that ID is a hard drive”); 20:12–14; *Supported by*: Petition, 43:2–4; Zadok, ¶90 (“With regard to hard disks in particular, the (mandatory) INQUIRY command ‘[r]eturns LUN specific information.’”); *see also* additional support in 3.
- 9–11. *Responsive to*: POR, 27:20–28:13 (“SCSI inquiry and responses are made at a given device ID.... [The] data reading unit... has its own device ID....[I]t would render [Kawaguchi] inoperable if the interface device... responded to any Inquiry... by saying the device at that ID is a hard drive”); 20:12–14; *Supported by*: Zadok, ¶90 (“With regard to hard disks in particular, the (mandatory) INQUIRY command ‘[r]eturns LUN specific information.’”); ¶98 (“INQUIRY command ‘can be used to learn... the device type’”); *see also* additional support in 3.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Lori A. Gordon, Reg. No. 50,633
Attorney for Petitioner

Date: December 12, 2017

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PETITIONER'S RESPONSIVE ITEMIZED LIST** was served electronically via e-mail on December 12, 2017, in its entirety on the following:

Gregory S. Donahue (Lead Counsel)
Minghui Yang (Back-up Counsel)
Michael R. Fleming (Back-up Counsel)
Anthony L. Meola (Back-up Counsel)
Jason A. Murphy (Back-up Counsel)
Victor J. Baranowski (Back-up Counsel)
Arlen L. Olsen (Back-up Counsel)

gdonahue@dpelaw.com

myang@dpelaw.com

docketing@dpelaw.com

mflaming@irell.com

ameola@iplawusa.com

jmurphy@iplawusa.com

vbaranowski@iplawusa.com

aolsen@iplawusa.com

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Lori A. Gordon, Reg. No. 50,633
Attorney for Petitioner

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