

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 IPR2016-01840
Patent 9,189,437

**PATENT OWNER PAPST LICENSING GMBH & CO., KG'S
PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107**

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1.	THE PRIOR ART DOES NOT DISCLOSE THE “WITHOUT REQUIRING ANY END USER TO LOAD ANY SOFTWARE ONTO THE COMPUTER AT ANYTIME” AND “WITHOUT REQUIRING ANY END USER TO INTERACT WITH THE COMPUTER TO SET UP A FILE SYSTEM IN THE ADGPD AT ANY TIME” LIMITATION OF INDEPENDENT CLAIM 1	23
2.	THE PRIOR ART DOES NOT DISCLOSE THE “IDENTIFYING THE ANALOG DATA GENERATING AND PROCESSING DEVICE, INDEPENDENT OF ANALOG DATA SOURCE, AS A DIGITAL STORAGE DEVICE INSTEAD OF AS AN ANALOG DATA GENERATING AND PROCESSING DEVICE” LIMITATION OF INDEPENDENT CLAIM 1 AND THE CORRESPONDING LIMITATION OF INDEPENDENT CLAIM 43	26
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EXHIBIT LIST

Currently Filed – Patent Owner

Ex. No.	Description
2001	United States Patent No. 5,508,821 to Murata
2002	August 24, 2006 Preliminary Amendment for U.S. Application No. 11/467,092 resulting in '437 Patent
2003	January 2, 2008 Preliminary Amendment for U.S. Application No. 11/467,092 resulting in '437 Patent

Previously Filed – Petitioner

Ex. No.	Description
1001	U.S. Patent 9,189,437 to Tasler
1002	File History Excerpts for U.S. Patent 9,189,437
1003	Declaration of Dr. Erez Zadok in Support of Petition for Inter Partes Review of U.S. Patent No. 9,189,437
1004	Curriculum Vitae of Dr. Erez Zadok
1005	<i>Intentionally left blank</i>
1006	<i>Intentionally left blank</i>
1007	“The SCSI Bus and IDE Interface Protocols, Applications and Programming,” Schmidt, Friedhelm, 1995
1008	<i>Intentionally left blank</i>
1009	<i>Intentionally left blank</i>
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	<i>Operating System Concepts</i> , by Silberschatz <i>et al.</i> , Fourth Edition, 1994
1014	<i>Microsoft Computer Dictionary</i> , Third Edition, Microsoft Press, 1997
1015-1017	<i>Intentionally left blank</i>
1018	IEEE Dictionary
1019	<i>Intentionally left blank</i>
1020	<i>Papst Licensing GmbH & Co., KG v. Apple Inc.</i> , Case No. 6-15-cv-01095 (E.D. Tex.), Complaint filed November 30, 2015
1021-1023	<i>Intentionally left blank</i>
1024	Declaration of Scott Bennett
1025-1029	<i>Intentionally left blank</i>
1030	Misc. Action No. 07-493 (RMC), MDL No. 1880, Order Regarding Claims Construction
1031	Plug-and-Play SCSI Specification, Version 1.0, dated March 30, 1994 (“PNP SCSI”)
1032-1035	<i>Intentionally left blank</i>
1036	European Patent Application 0 475 639 A2 dated August 29, 1991 to Applicant Kawasaki Steel Corporation (“Kawasaki”)
1037	U.S. Patent No. 6,111,831 to Alon <i>et al.</i>
1038	U.S. Patent No. 4,856,871 to Van Sant
1039	U.S. Patent No. 5,515,237 to Ogami <i>et al.</i>
1040	U.S. Patent No. 5,590,375 to Sangveraphunsiri <i>et al.</i>

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