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 IPR2016-01842 Patent 9,189,437

PETITIONER'S REPLY TO THE PATENT OWNER RESPONSE

Mail Stop "PATENT BOARD" Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



TABLE OF CONTENTS

I.	Intro	Introduction		
II.	Claim Construction		2	
	A.	The <i>Phillips</i> claim construction standard applies.	2	
	B.	"multi-purpose interface" and "customary device driver"	2	
III.	Response to POs Arguments			
	A.	The applied combination teaches or suggests that "the processed and digitized analog data is stored in the data storage memory as at least one file of digitized analog data" (Ground 1)	5	
	В.	The applied combination teaches or suggests that "an automatic recognition process" (Ground 1) and "automatically generating and transmitting an identification parameter" (Ground 5)	11	
	C.	The applied combination teaches or suggests that "without requiring any user-loaded file transfer enabling software" (Ground 1) and "without requiring the user to load the device driver" (Ground 5)	18	
IV.	PO does not raise arguments specific to the dependent claims		24	
V.	PO's belief of unconstitutionality is not a request for relief2			
VI.	Con	Conclusion2		



TABLE OF AUTHORITIES

Cases:

In re CBS-Sys. Int'l,	
832 F.3d 1335 (Fed. Cir. 2016)	2
In re Fulton,	
391 F.3d 1195 (Fed. Cir. 2004)	9
In re Mouttet,	
686 F.3d 1322 (Fed. Cir. 2012)	6
O2 Micro Intern. v. Beyond,	
521 F.3d 1351, 1362 (Fed. Cir. 2008)	4
PC Connector Solutions LLC v. SmartDisk Corp.,	
406 F.3d 1359 (Fed. Cir. 2005)	3
Phillips v. AWH Corp.,	
415 F.3d 1303 (Fed. Cir. 2005)	passim



EXHIBIT LIST

Exhibit	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	Intentionally left blank
1006	Intentionally left blank
1007	"The SCSI Bus and IDE Interface Protocols, Applications and
	Programming," Schmidt, Friedhelm, 1995
1008	Intentionally left blank
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.
1015-1017	Intentionally left blank
1018	IEEE Dictionary
1019	Intentionally left blank
1020	Papst Licensing GmbH & Co., KG v. Apple Inc., Case No. 6-15-cv-
	01095 (E.D. Tex.), Complaint filed November 30, 2015
1021-1023	Intentionally left blank
1024	Declaration of Scott Bennett
1025-1029	Intentionally left blank
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")
1032-1036	Intentionally left blank
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 et al.
1040	U.S. Patent No. 5,590,375 to Sangveraphunsiri <i>et al</i> .



Exhibit	Description
1041	Pucci, M., "Configurable Data Manipulation in an Attached
	Multiprocessor, "1991
1042	U.S. Patent No. 4,790,003 to Kepley et al., titled "Message Service
	System Network"
1043	U.S. Patent No. 5,081,454 to Campbell, Jr. et al., titled "Automatic
	A/D Converter Operation Using Programmable Sample Time"
1044	U.S. Patent No. 5,353,374 to Wilson <i>et al.</i> , titled "Low Bit Rate
	Voice Transmission for Use in a Noisy Environment"
1045	U.S. Patent No. 4,065,644 to Shinosky
1046-1048	Intentionally left blank
1049	'144 German Application (DE 197 08 755)
1050	'144 German Application Translated (DE 197 08 755)
1051	Intentionally left blank
1052	USENIX Declaration
1053	Intentionally left blank
1054	Declaration of Dr. Erez Zadok in Support of Reply ("Zadok II")
1055	October 10, 2017 Deposition Transcript of Thomas Gafford
	("Gafford I")
1056	October 11, 2017 Deposition Transcript of Thomas Gafford
	("Gafford II")



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.

