IPR2016-01842, IPR2016-01860
IPR2016-01863, IPR2016-01864

Apple, Inc.,
Petitioner
v.
Papst Licensing GmbH & Co. KG,
Patent Owner

U.S. Patent No. 9,189,437
U.S. Patent No. 8,966,144
U.S. Patent No. 8,504,746
U.S. Patent No. 6,470,399

'399 PATENT, '144 PATENT, '746 PATENT AND '437 PATENT INTRODUCTION

The '746 Patent recognizes that the existing options were wasteful and inefficient and presents a solution that would achieve high data transfer rates, without specialized software, while being sufficiently flexible to operate independent of device or host manufacturers. *Id*. at 2:22-41 and 3:28-31. The resulting invention would allow a data acquisition system to identify itself as a type of common device so as to leverage the inherent capabilities of general-purpose, commercially-available computers. *Id*. at 4:13-27. Accordingly, users could avoid loading specific software; improve data transfer efficiency; save time, processing power, and memory space; and avoid the waste associated with purchasing specialized computers or loading specific software for each device. *Id*. at 3:28-31, 3:32-45, 7:32-65, 8:29-36, 9:16-19 and 11:29-46. The '746 Patent claims variations of this concept and provides a crucial, yet seemingly simple, method and apparatus for a high data rate, device-independent information transfer. *Id*. at 3:28-31.

Paper 16 (Patent Owner Response IPR2016-01863) at 2-3; Exhibit 1001
('746 Patent IPR2016-01863) at 2:22-41, 3:28-31, 4:13-27, 3:32-45, 7:32-65, 8:29-36, 9:16-19 and 11:29-46

‘399 PATENT, ‘144 PATENT, ‘746 PATENT AND ‘437 PATENT INTRODUCTION

In contrast, the interface device of the ‘746 Patent avoids this problem because it simulates, *both in terms of hardware and software*, the way a hard drive works. Consequently, it can respond to a SCSI inquiry that it is a hard drive without risking destructive interactions with the host device or reconfigurations of the interface device by the host device. Exhibit 1001 (‘746 Patent) at 4:14-18 (“The interface device according to the present invention therefore simulates, both in terms of hardware and software, the way in which a conventional input/output device functions, preferably that of a hard disk drive.”).

Paper 16 (Patent Owner Response IPR2016-01863) at 23;
Exhibit 1001 (‘746 Patent IPR2016-01863) at 4:14-18

PRIOR ART INTRODUCTION - PUCCI

The ION system couples an analog to digital converter ("ADC") to a SCSI target interface through a memory buffer. The SCSI target responds to disk drive commands for reading. However, access by the host to ADC data is done by means of the host reading a single block address in the simulated disk drive. Thus, the ADC data is not provided by files in a file system. The ION reference also has the ability to emulate a file system, but it teaches that this is only used for disk drive performance analysis, not for ADC access. *Id*. at 236. As such, the reference teaches away from accessing ADC data in the form of files because files exist but are not used for ADC data. ADC data is accessed by an application that does not use the host computer's file system, and instead reads a certain disk block to obtain ADC data. *Id*. at 221.

Paper 16 (Patent Owner Response IPR2016-01863) at 12-13;
Exhibit 1041 (Pucci IPR2016-01863) at 221

PRIOR ART INTRODUCTION - PUCCI

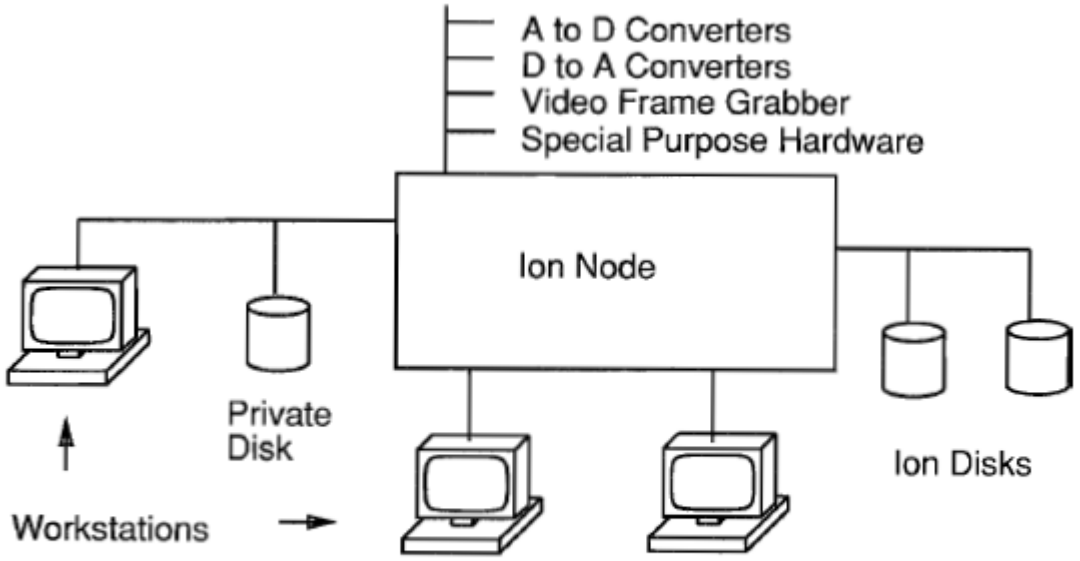

Figure 1. An ION system. Multiple workstations connect to an ION node, which contains single board computers and other peripheral interfaces and devices. Each workstation views its ION connection as though it were a large conventional disk drive.

Exhibit 1041 (Pucci IPR2016-01863) at Figure 1; Paper 2 (Petition IPR2016-01863) at 18

DOCKET ALARM

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.