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 IPR2016-01863 Patent 8,504,746
ATENT OWNED DARST LICENSING CMRH & CO. KC'S



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	C.	THE BOARD SHOULD NOT INSTITUTE TRIAL BECAUSE THE PETITION'S GROUNDS OF REJECTION DO NOT DISCLOSE THE "WHEREBY THERE IS NO REQUIREMENT FOR ANY USER-LOADED FILE TRANSFER ENABLING SOFTWARE TO BE LOADED ON OR INSTALLED IN THE COMPUTER IN ADDITION TO THE OPERATING SYSTEM" LIMITATION OF INDEPENDENT CLAIM 1 OR THE CORRESPONDING LIMITATION OF INDEPENDENT CLAIM 34
	D.	THE BOARD SHOULD DENY INSTITUTION OF THE PETITION UNDER 35 U.S.C. § 325(d)23



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EXHIBIT LIST

<u>Currently Filed – Patent Owner</u>

Ex. No.	Description
2001	Defendants' Responsive Claim Construction Brief in Papst Licensing
	GmbH & Co., KG v. Apple, Inc. (6:15-CV-01095-RWS)
2002	United States Patent No. 5,508,821 to Murata
2003	August 24, 2006 Preliminary Amendment for U.S. Application No.
	11/467,073 resulting in '144 Patent
2004	July 17, 2007 Preliminary Amendment for U.S. Application No.
	11/467,073 resulting in '144 Patent
2005	December 18, 2007 Preliminary Amendment for U.S. Application No.
	11/467,073 resulting in '144 Patent

<u>Previously Filed – Petitioner</u>

Ex. No.	Description
1001	U.S. Patent 8,504,746 to Tasler
1002	Excerpts of File History of U.S. Patent 8,504,746 to Tasler
1003	Declaration of Dr. Erez Zadok in Support of Petition for <i>Inter Partes</i>
	Review of U.S. Patent No. 8,504,746
1004	Curriculum Vitae of Dr. Erez Zadok
1005-1006	Intentionally Left Blank
1007	The SCSI Bus and IDE Interface Protocols, Applications and
	Programming, by Schmidt, First Edition, Addison-Wesley, 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.



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In re Papst Licensing Digital Camera Patent Litigation, 778 F.3d
1255 (Fed. Cir. 2015).
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Webster's Encyclopedic Unabridged Dictionary of the English
Language, Random House, 1996.
Papst Licensing GmbH & Co., KG v. Apple Inc., Case No. 6-15-cv-
01095 (E.D. Tex.), Complaint filed November 30, 2015
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Declaration of Scott Bennett
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Plug-and-Play SCSI Specification, Version 1.0, dated March 30, 1994
("PNP SCSI")
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Pucci, M., "Configurable Data Manipulation in an Attached
Multiprocessor," 1991
U.S. Patent No. 4,790,003 to Kepley et al., titled "Message Service
System Network"
Intentionally Left Blank
U.S. Patent No. 5,353,374 to Wilson et al., titled "Low Bit Rate Voice
Transmission for Use in a Noisy Environment"
U.S. Patent No. 4,065,644 to Shinosky, Jr., titled "Electro-Optical and
Electronic Switching Systems"
Intentionally Left Blank
Declaration of Michele Nelson, USENIX



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