

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.**

## ‘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

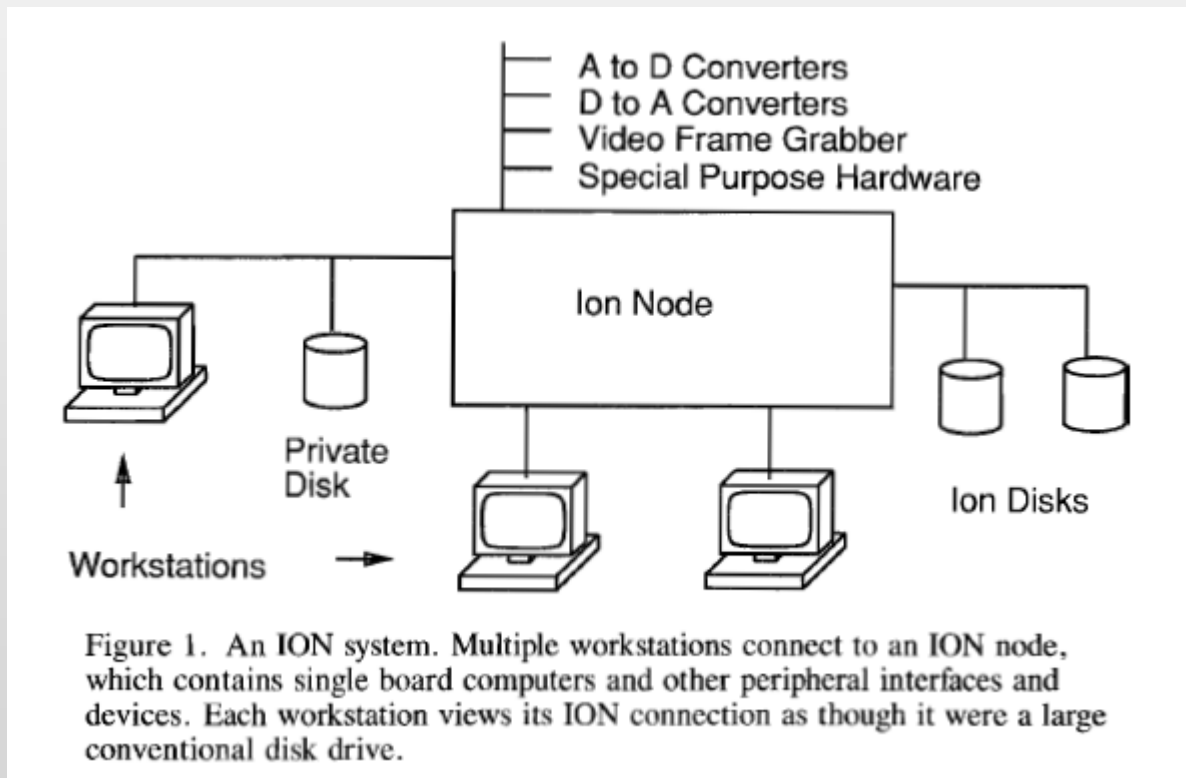


Exhibit 1041 (Pucci IPR2016-01863) at Figure 1; Paper 2 (Petition IPR2016-01863) at 18

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