

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KINGSTON TECHNOLOGY COMPANY, INC.,
Petitioner v.
POLARIS INNOVATIONS LTD.,
Patent Owner

Case No. IPR2017-00238
Patent 6,157,589

PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,157,589

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EXHIBIT LIST

Exhibit No.	Description
KINGSTON-1001	U.S. Patent No. 6,157,589 ('589 Patent)
KINGSTON-1002	File History of U.S. Patent No. 6,157,589
KINGSTON-1003	Declaration of Dr. Subramanian
KINGSTON-1004	Curriculum Vitae of Dr. Subramanian
KINGSTON-1005	U.S. Patent No. 6,243,797 B1 ("Merritt")
KINGSTON-1006	U.S. Patent No. 5,448,528 ("Nagai")
KINGSTON-1007	JEDEC Standard 21-C Release 4
KINGSTON-1008	Plaintiff Polaris Innovations Limited's Preliminary Disclosure Of Asserted Claims And Infringement Contentions, Exhibit 1, Preliminary Infringement Claim Chart for U.S. Patent No. 6,157,589 ("589 Patent") <i>Polaris Innovations Ltd. v. Kingston Tech. Co., Inc.</i> , Case No. 8:16-cv-300-CJC (C.D. Cal. July 8, 2016)

I. INTRODUCTION AND STATEMENT OF RELIEF REQUESTED (37 C.F.R. §42.22(A))

Kingston Technology Company, Inc. (“Petitioner”) hereby petitions for institution of *inter partes* review of U.S. Patent No. 6,157,589 (the “’589 Patent”) (Ex. 1001). The ’589 Patent issued on December 5, 2000. Polaris Innovations Limited (“Patent Owner”) is the assignee of record with the USPTO. Petitioner respectfully requests cancellation of claims 11 and 12 of the ’589 Patent based on the grounds of unpatentability herein. The prior art and other evidence offered with this Petition establishes that all elements in the challenged claims of the ’589 Patent were well known as of the earliest alleged priority date, and that the claimed methods and systems recited in the ’589 Patent are obvious.

II. GROUNDS FOR STANDING (37 C.F.R. §42.104(A))

Petitioner certifies that the ’589 Patent is available for review under 35 U.S.C. § 311(c) and that Petitioner is not estopped from requesting an *inter partes* review challenging claims 11 and 12 on the grounds identified herein.

III. MANDATORY NOTICES (37 C.F.R. §42.8(A)(1))

A. Real Party-In-Interest (37 C.F.R. §42.8(b)(1))

Petitioner Kingston Technology Company, Inc., is the real party in interest.

B. Identification of Related Matters (37 C.F.R. §42.8(b)(2))

The following matter would be affected by a decision in this proceeding:

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