UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG ELECTRONICS, INC. AND ZTE (USA) INC.,
Petitioners,

v.

PAPST LICENSING GMBH & CO., KG,
Patent Owner.

Case IPR2017-00415
United States Patent No. 6,895,449

PATENT OWNER PAPST LICENSING GMBH & CO., KG'S RESPONSE UNDER 37 C.F.R. § 42.120

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REGARDLESS OF THE TYPE OF THE DATA TRANSMIT/RECEIVE DEVICE ATTACHED TO THE SECOND CONNECTING DEVICE OF THE INTERFACE DEVICE, TO THE HOST DEVICE WHICH SIGNALS TO THE HOST DEVICE THAT IT IS A STORAGE DEVICE CUSTOMARY IN A HOST DEVICE" LIMITATION OF INDEPENDENT CLAIM 1 OR THE CORRESPONDING LIMITATIONS OF INDEPENDENT CLAIMS 17 AND 18 OF THE '449 PATENT.....13

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EXHIBIT LIST

Currently and Previously Filed – Patent Owner

Ex. No.	Description
2001	Defendants' Responsive Claim Construction Brief in *Papst Licensing GmbH & Co., KG v. Apple, Inc.* (6:15-CV-01095-RWS)
2002	*In re Papst Licensing Digital Camera Patent Litigation*, 778 F.3d 1255 (Fed. Cir. 2015)
2003	Definition of charge-coupled device, *Dictionary of Engineering* (2015)
2004	Confidential Settlement Agreement Between Huawei Device Co., Ltd. and Papst Licensing GmbH & Co., KG
2005	Declaration of Thomas A. Gafford in Support of Patent Owner Response ("Gafford Declaration")
2006	mkdev Command Definition from IBM Knowledge Center (https://www.ibm.com/support/knowledgecenter/en/ssw_aix_61/com.ibm.aix.cmds3/mkdev.htm)
2007	August 24, 2006 Preliminary Amendment for U.S. Application No. 11/467,092 resulting in '437 Patent
2008	July 17, 2007 Preliminary Amendment for U.S. Application No. 11/467,092 resulting in '437 Patent
2009	January 2, 2008 Preliminary Amendment for U.S. Application No. 11/467,092 resulting in '437 Patent

Previously Filed – Petitioners

Ex. No.	Description
1001	U.S. Patent No. 6,895,449 to Tasler
1002	File History for U.S. Patent No. 6,895,449
1003	Declaration of Kevin C. Almeroth
1004	Curriculum Vitae of Kevin C. Almeroth
1005	U.S. Patent No. 5,508,821 to Murata
1006	Friedhelm Schmidt, *The SCSI Bus and IDE Interface* (1995)
1007	U.S. Patent No. 5,850,484 to Berretta *et al.*

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1008	European Patent Office Publication Number 0 685 799 A1
1009	IBM Corp., *Communication Method Between Devices Through FDD Interface* 38 IBM Technical Disclosure Bulletin 245
1010	Ray Duncan, *The MS-DOS Encyclopedia* (1988)
1011	*In re Papst Licensing Dig. Camera Pat. Litig.*, 778 F.3d 1255, 1265 (Fed. Cir. 2015)
1012	Papst's Opening Claim Constr. Brief and Appendix 8 of Papst's Opening Claim Constr. Brief, *Papst Licensing GmbH & Co., KG v. Apple, Inc., et al.*, No. 6:15-cv-01095-RWS (E.D. Tex. Nov. 22, 2016)
1013	Papst's Opening Claim Constr. Brief and Decl. of Robert Zeidman, *In Re Papst Licensing Dig. Camera Pat. Litig.*, MDL No. 1880, 1:07-mc-00493, (D.D.C. June 3, 2016)
1014	Am. Nat'l Standards Inst., Inc., *Am. Nat'l Standard for Info. Sys's Small Computer System Interface-2*, ANSI X3.131-1994 (1994) ("SCSI Standard")
1015	Dave Williams, *The Programmer's Technical Reference: MS-DOS, IBM PC & Compatibles* (1990)
1016	File History for U.S. Patent Application No. 08/411,369
1017	Comparison of excerpts of File History for U.S. Patent Application No. 08/411,369 and U.S. Patent No. 5,850,484 to Beretta *et al*. (Ex. 1007)
1018	U.S. Patent No. 4,589,063 to Shah *et al*.
1019	U.S. Patent No. 5,038,320 to Heath *et al*.
1020	U.S. Patent No. 5,787,246 to Lichtman *et al*.
1021	Vetterli & Nussbaumer, *Simple FFT and DCT Algortihms, 6 Signal Processing* 267-78 (1984)
1022	Papst's Brief, *In re Papst Licensing Dig. Camera Pat. Litig.*, No 2014-1110 (Fed. Cir. February 20, 2014)
1023	Rufus P. Turner *et al*., *The Illustrated Dictionary of Electronics* (1991)
1024	*Markman* order interpreting various terms in U.S. Patent No. 6,895,449, *Papst Licensing GmbH & Co., KG v. Apple Inc.*, Case No. 6:15-01096-RWS, Dkt. 275 (E.D. Texas March 7, 2017)

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