UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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HTC Corporation and HTC America, Inc.,
PETITIONERS

v.

Parthenon Unified Memory Architecture LLC,
PATENT OWNER

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Case IPR2017-00512
U.S. Patent No. 5,812,789

Title: VIDEO AND/OR AUDIO DECOMPRESSION AND/OR COMPRESSION DEVICE THAT
SHARES A MEMORY INTERFACE

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PATENT OWNER'S PRELIMINARY RESPONSE
UNDER 37 C.F.R. §42.107

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TABLE OF AUTHORITIES

TABLE OF EXHIBITS

Exhibit No.	Exhibit Description
1001	U.S. Patent No. 5,812,789 ("`789 Patent")[1]
1005	U.S. Patent No. 5,546,547 ("Bowes")
1007	U.S. Patent No. 5, 001,625 ("Thomas")
2003	Declaration of Mitchell A. Thornton (Thornton Decl.") from IPR2016-01135
2004	Deposition testimony of Robert Colwell, Ph.D. dated February 27, 2017 ("Colwell Depo.") from IPR2016-01135

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[1] Ex. 1001, 1005, and 1007 are already of record and not attached to this Preliminary Response.

I.   INTRODUCTION

The patent owner Parthenon Unified Memory Architecture LLC ("Patent Owner") respectfully requests that the Board deny the Petition for *Inter Partes* review ("Petition") filed by HTC Corporation and HTC America, Inc. ("Petitioner") regarding certain claims of U.S. Patent No. 5,812,789 ("'789 Patent") because the Petition fails to demonstrate a reasonable likelihood that the Petitioner would prevail as to at least one of the challenged claims, as required under 34 U.S.C. § 314(a).

The Petition proposes four grounds challenging claims 1–8 and 11–14 ("challenged claims"). Specifically, the Petitioner contends that certain challenged claims are invalid as obvious in view of Bowes, TMS, and Thomas (Ground A). The Petitioner also contends that certain dependent challenged claims are obvious in view of Bowes, TMS, Thomas, and Gove (Ground B) or Ran (Ground C) or Celi (Ground D).

For the reasons discussed below, Bowes, TMS, and Thomas do not render claim 1 obvious. Because they depend on claim 1, claims 2–8 and 11–14 are allowable for at least the same reasons. Therefore, there is no reasonable likelihood that the Petitioner would prevail with respect to any of the claims challenged in Grounds A–D, and the Petition should be denied.

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