

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY CORPORATION
Petitioners,

v.

AVAGO TECHNOLOGIES GENERAL IP (SINGAPORE) PTE. LTD.,
Patent Owner.

Inter Partes Review No. IPR2017-00520

U.S. Patent No. 5,870,087

**PATENT OWNER AVAGO TECHNOLOGIES GENERAL IP
(SINGAPORE) PTE. LTD.'S PRELIMINARY RESPONSE UNDER
37 C.F.R. § 42.107 TO PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 5,870,087**

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LIST OF EXHIBITS

1001	U.S. Patent No. 5,870,087
1002	File History of U.S. Patent No. 5,870,087
1003	Declaration of Dr. Chandrajit Bajaj
1004	U.S. Patent No. 5,898,695 to Fujii et al. ("Fujii")
1005	U.S. Patent No. 6,002,441 to Bheda et al. ("Bheda")
1006	U.S. Patent No. 5,960,464 to Lam ("Lam")
1007	U.S. Patent No. 5,559,999 to Maturi et al. ("Maturi")
1008	"Unified Memory Architecture Cuts PC Cost" by Yong Yao ("Yao") published on June 19, 1995 in Volume 9, Issue No. 8 of Microprocessor Report
1009	Business Wire, VESA Announces Release of Unified Memory Architecture Standard (March 8, 1996)
1010	H.262 Standard
1011	"Fast computer memories" is an article by Ray Ng ("Ng") published in October 1992 in IEEE Spectrum

Patent Owner Avago Technologies General IP (Singapore) Pte. Ltd. ("Avago" or "Patent Owner") hereby respectfully submits this Preliminary Response to the Petition seeking *inter partes* review in this matter. This filing is timely under 35 U.S.C. § 313 and 37 C.F.R. § 42.107(b), as it is being filed within three months of the January 20, 2017 mailing date of the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper 5).

The Patent Trial and Appeal Board (the "Board") should decline to institute *inter partes* review in this matter because none of the references or combinations of references relied upon by Petitioners establish a reasonable likelihood that Petitioners will prevail with respect to any challenged claim of U.S. Patent No. 5,870,087 (the "'087 Patent").

I. INTRODUCTION

The Petition for *Inter Partes* Review Case No. IPR2017-00520 (the "Petition") filed by Sony Corporation ("Petitioners") challenges the validity of Claims 1-3, 5, 7, 10-13, and 16-18 of the '087 Patent. "The Director may not authorize an inter partes review to be instituted unless the Director determines that the information presented in the petition filed under section 311 . . . shows that there is a reasonable likelihood that the petitioner would prevail with respect to at least 1 of the claims challenged" 35 U.S.C. § 314(a). The Petition fails to

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