

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZTE (USA) Inc.,
Petitioner,

v.

PAPST LICENSING GmbH & Co. KG,
Patent Owner.

Case IPR2017-00713
Patent 6,895,449 B2

**PAPST LICENSING GMBH & CO. KG'S
PRELIMINARY RESPONSE**

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C. Aytac Does Not Disclose “Whereupon The Host Device Communicates With The Interface Device By Means Of The Driver For The Storage Device Customary In A Host Device” As Required In Claim 1, Or “Whereupon The Host Device Communicates With The Interface Device By Means Of The Specific Driver For The Multi-Purpose Interface” As Required By Claim 17 29

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D. Petitioner Fails To Show That Aytac Discloses “The Interface Device Is Arranged For Simulating A Virtual File System To The Host,” As Required In Claims 1 and 17 40

VII. CONCLUSION 42

EXHIBIT LIST

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. 5,758,081 to Aytac
1006	Am. Nat'l Standard Inst., Inc., Am. Nat'l Standard for Info. Sys's Small Computer System Interface (SCSI) (1994)
1007	Ray Duncan, <i>The MS-DOS Encyclopedia</i> (1988)
1008	In Re Papst Licensing Dig. Camera Pat. Litig., 778 F.3d 1255, 1265 (Fed. Cir. 2015)
1009	Papst's Opening Claim Constr. Brief and Appendix 8 of Papst's Opening Claim Constr. Brief, Papst Licensing GmbH & Co., KG v. Apple, Inc., No. 6:15-cv-01095-RWS (E.D. Tex. Nov. 22, 2016)
1010	Papst's Opening Claim Constr. Brief and Decl. of Robert Zeidman, <i>In re Papst Licensing Dig. Camera Pat. Litig.</i> , MDL No. 1880, 1:07- mc-00493 (D.D.C. June 3, 2016)
1011	As-Filed German priority document Patent Application 197 08 755.8
1012	'399 German Application Publication (DE 197 08 755)
1013	Certified Translation of Published '399 German Application (DE 197 08 755)
1014	English Translation of PCT Application PCT/EP98/01187 (published as PCT Pub. No. WO98/39710)
1015	U.S. Patent No. 4,589,063 to Shah
1016	U.S. Patent No. 5,038,320 to Heath
1017	U.S. Patent No. 5,787,246 to Lichtman
1018	Rufus P. Turner et al., <i>The Illustrated Dictionary of Electronics</i> (1991)
1019	Decision, Institution of <i>Inter Partes Review</i> , <i>Canon Inc. v. Papst Licensing GmbH & Co., KG</i> , Case IPR2016-01200, Paper 8 (PTAB Dec. 15, 2016).

1020	File History for U.S. Pat. No. 5,758,081 to Aytac
1021	Papst's Brief, <i>In Re Papst Licensing Dig. Camera Pat. Litig.</i> , No. 2014-1110 (Fed. Cir., February 20, 2014)
2001	Declaration of Thomas Gafford
2002	Petition in <i>Fujifilm Corp. v. Papst Licensing GmbH & Co., KG</i> , IPR2016-0199, Paper 1 at 35 (PTAB June 14, 2016)
2003	Manual of Patent Examining Procedure § 608.05, 6th ed., rev. 1 (Sept. 1, 1995)
2004	Claim Construction Opinion and Order, <i>Papst Licensing GmbH & Co., KG v. Apple, Inc.</i> , 6:15-cv-01095, D.E. 275 (E.D. Tex. March 7, 2017)

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