

**IN THE 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 No. To Be Assigned  
Patent No. 6,470,399 B2

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**PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO.**  
**6,470,399 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.100 *et seq.***

**PETITIONER’S EXHIBIT LIST**

<b>Exhibit</b>	<b>Description</b>
Ex. 1001	U.S. Pat. No. 6,470,399 to Tasler (“the ‘399 Patent”)
Ex. 1002	File History for U.S. Pat. No. 6,470,399
Ex. 1003	Declaration of Kevin C. Almeroth (“Almeroth Declaration”)
Ex. 1004	Curriculum vitae of Kevin C. Almeroth
Ex. 1005	U.S. Patent No. 5,758,081 to Aytac (“Aytac”)
Ex. 1006	Am. Nat’l Standard Inst., Inc., <i>Am. Nat’l Standard for Info. Sys’s, Small Computer System Interface-2, ANSI X3.131-1994 (1994)</i> (the “SCSI Specification”)
Ex. 1007	U.S. Patent No. 6,522,432 to Lin (“Lin”)
Ex. 1008	<i>In re Papst Licensing Dig. Camera Pat. Litig.</i> , 778 F.3d 1255, 1265 (Fed. Cir. 2015)
Ex. 1009	Papst’s Opening Claim Constr. Brief and Appendix 8 of Papst’s Opening Claim Constr. Brief, <i>Papst Licensing GmbH &amp; Co., KG v. Apple, Inc., et al.</i> , No. 6:15-cv-01095-RWS (E.D. Tex. Nov. 22, 2016)
Ex. 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, No. 1:07-mc-00493 (D.D.C. June 3, 2016)
Ex. 1011	As-Filed Filed German priority document Patent Application 197 08 755.8
Ex. 1012	'399 German Application Publication (DE 197 08 755)
Ex. 1013	Certified Translation of Published '399 German Application (DE 197 08 755)
Ex. 1014	English Translation of PCT Application PCT/EP98/01187 (published as PCT Pub. No. WO98/39710)
Ex. 1015	U.S. Patent No. 4,589,063
Ex. 1016	U.S. Patent No. 5,038,320
Ex. 1017	U.S. Patent No. 5,787,246
Ex. 1018	Rufus P. Turner <i>et al.</i> , <i>The Illustrated Dictionary of Electronics</i> (1991)
Ex. 1019	IPR2016-1200, Paper No. 8
Ex. 1020	Source code submitted with the Aytac application in 1995

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  - B. Prosecution History of the ‘399 Patent

- C. Priority Date of the Claims of the '399 Patent
- D. Claim Construction (37 C.F.R. § 42.104(b)(3))
  - 1. “data transmit/receive device”
  - 2. “simulating a virtual file system”
  - 3. “interface device”

**VI. Summary of References Applied in this Petition**

- A. U.S. Patent No. 5,758,081 to Aytac (Ex. 1005)
- B. Am. Nat'l Standard Inst., Inc., Am. Nat'l Standard for Info. Sys's, Small Computer System Interface-2, ANSI X3.131-1994 (1994) (Ex. 1006)
- C. U.S. Patent No. 6,522,432 to Lin (Ex. 1009)

**VII. Detailed Explanation of Grounds**

- A. Ground I: Claims 1-3, 5, 6, 11, 14 and 15 are Unpatentable Under 35 U.S.C. § 103(a) over Aytac in view of the SCSI Specification, Lin, and the admitted prior art
  - 1. Rationale for Combining Aytac with the SCSI Specification and Lin.
    - 1. Claims 1, 11 and 14
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