

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 IPR2017-00714
Patent 6,470,399 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 Input/Output Device Customary In a Host Device” As Required In Claim 1, “Whereupon The Host Device Communicates With The Interface Device By Means Of The Specific Driver For The Multi-Purpose Interface” As Required In Claim 11, or “Whereupon The Host Device Communicates With The Interface Device By Means Of The Usual Driver For The Input/Ouput Device” As Required By Claim 14 31

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ii. CaTbox Requires Specialized Software Installed On The Host PC To Be A Multitasking Device To Solve The Problem Of Integrating Operation Of Multiple Devices With A PC..... 37

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EXHIBIT LIST

Ex. No.	Description
1001	U.S. Patent No. 6,470,399 to Tasler
1002	File History for U.S. Patent No. 6,470,399
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 Standards Inst. Inc., <i>Am. Nat'l Standard for Info. Sys's Small Computer System Interface-2</i> , ANSI X3. 131-1994 (1994) ("SCSI Specification")
1007	U.S. Patent No. 6,522,432 to Lin
1008	<i>In re Papst Licensing Dig. Camera Pat. Litig.</i> 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, <i>Papst Licensing GmbH & Co., KG v. Apple, Inc., et al.</i> , 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 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. WO98/38710)
1015	U.S. Patent No. 4,589,063
1016	U.S. Patent No. 5,038,320
1017	U.S. Patent No. 5,787,246
1018	Rufus P. Turner et al., <i>The Illustrated Dictionary of Electronics</i> (1991)
1019	IPR2016-1200, Paper No. 8
1020	Source code submitted with the Aytac application in 1995
1021	Papst's Brief, <i>In re Papst Licensing Digital Camera Patent</i>

	<i>Litig., No. 2014-1110</i> (Fed. Cir., February 20, 2014)
2001	Declaration of Thomas Gafford
2002	(Reserved)
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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