UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LG Electronics, Inc.,

Petitioner

v.

Papst Licensing GmbH & Co., KG,

Patent Owner

CASE: Unassigned

Patent No. 9,189,437

PETITION FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. §42.100

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A. Aytac discloses every limitation of independent claim 1 with the possible exception of automatic recognition process (ARP) features. 22

1. Limitations 1[preamble] and 1[a] – Analog data generating and processing device (ADGPD) and i/o port....22

2. Limitation 1[b] – program memory....24

3. Limitation 1[c] – data storage memory 26

4. Limitation 1[d] – processor operatively interfaced with the i/o port, the program memory and the data storage memory....27

5. Limitation 1[e(i)] – wherein the processor is adapted to implement a data generation process by which analog data is acquired from each respective analog acquisition channel of a plurality of independent analog acquisition channels 29

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6. Limitation 1[e(ii)] – the analog data from each respective channel is digitized, coupled into the processor, and is processed by the processor 30

7. Limitation 1[e(iii)] – the processed and digitized analog data is stored in the data storage memory as at least one file of digitized analog data 31

8. Limitation 1[f(i)] – wherein the processor is adapted to be involved in an automatic recognition process (ARP) 32

9. Limitation 1[f(ii)] – ARP occurs when the i/o port is operatively interfaced with the host's multi-purpose interface 35

10. Limitation 1[f(iii)] – In ARP the processor executes at least one instruction set stored in the program memory and thereby causes at least one parameter [identifying it to be sent to the host] 36

11. Limitation 1[f(iv)] – In ARP the at least one parameter identifies the ADGPD, independent of analog source, as a digital storage device instead of as an ADGPD 36

12. Limitation 1[f(v)] – In ARP the at least one parameter is automatically sent through the i/o port and to the host's multipurpose interface 37

13. Limitation 1[f(vi)] – ARP occurs without requiring any end user to load any software onto the computer at any time 37

14. Limitation 1[f(vii)] – ARP occurs without requiring any end user to interact with the computer to set up a file system in the ADGPD at any time 38

15. Limitation 1[f(viii)] – ARP - Wherein the at least one parameter is consistent with the ADGPD being responsive to commands from a customary driver 39

16. Limitation 1[g] – wherein the at least one parameter provides information to the computer about the ADGPD's file transfer characteristics 39

17. Limitation 1[h(i)] – wherein the processor is further adapted to be involved in an automatic file transfer process (AFTP) 40

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B. Aytac in view of the SCSI Specification discloses every limitation of independent claim 43.....44

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A. Claims 39 and 40 67

1. Aytac in view of the SCSI Specification and Adaptec discloses

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