UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics America, Inc., and ASUS Computer International, Inc.
Petitioner

v.

James B. Goodman, Patent Owner.

IPR2017-02021¹ Patent No. 6,243,315

PETITIONER'S REPLY

¹ Case IPR2018-00047, filed by ASUS Computer International, Inc., has been joined with this proceeding.



TABLE OF CONTENTS

I.	Intro	duction	1
II.	GRO	UND 1: DELL ANTICIPATES CLAIMS 1 AND 5	2
	A.	Dell discloses the claimed "control device," which selectively electrically isolates memory from "said respective address lines and respective control lines."	2
	В.	The Board correctly found that the '315 Patent does not require electrical isolation of all of the claimed memory at the same time	6
	C.	The Board correctly found that the '315 Patent does not require electrical isolation of the claimed memory from all the address lines and all the control lines	7
	D.	The '315 Patent does not preclude CKE signals from reaching the memory during a self-refresh mode	8
III.	GROUND 2: DELL AND ABE RENDER OBVIOUS CLAIMS 10 AND 16		10
	A.	There is ample motivation for combining Dell and Abe, and Goodman has not shown otherwise	10
IV.	_	ndS 3 AND 4: DELL, JESD21-C, AND ABE RENDER IOUS CLAIMS 2-4, 6-9, 11-15, AND 17-20	12
V.		UND 5: OOISHI AND PALANISWAMI RENDER OBVIOUS IMS 1 AND 5	13
	A.	Ooishi discloses memory capable of being placed in a self refresh mode and with address and control lines	13
	B.	Ooishi, in combination with Palaniswami, renders obvious the claimed "control device"	13
	C.	Ooishi, in combination with Palaniswami, renders obvious the claimed "memory access enable control device"	17
	D.	One skilled in the art would have been motivated to combine Ooishi and Palaniswami	17
VI.		UND 6: OOISHI, PALANISWAMI, AND ABE RENDER IOUS CLAIMS 10 AND 16	19
VII.	Conc	lusion	19
Certi	fication	n of Word Count	20



TABLE OF AUTHORITIES

<u>Cases</u> Arctic Cat Inc. v. Bombardier Recreational Prod.s, Inc., 876 F.3d 1350 (Fed. Cir. 2017)	11
Connell v. Sears Roebuck & Co., 722 F.2d 1542 (Fed. Cir. 1983)	
Gemtron Corp. v. Saint-Gobain Corp., 572 F.3d 1371 (Fed. Cir. 2009)	16
In re Fracalossi, 681 F.2d 792 (CCPA 1982)	19
<i>In re McDaniel</i> , 293 F3d. 1379 (Fed. Cir. 2002)	19
In re Natures Remedies, Ltd., 315 Fed. App'x. 300 (Fed. Cir. 2009)	15
Laitram Corp. v. Cambridge Wire Cloth Co., 919 F.2d 1579 (Fed. Cir. 1990)	17
Outdry Techs. Corp. v. Geox S.p.A., 859 F.3d 1364 (Fed. Cir. 2017)	11
Perfect Web Techs., Inc. v. InfoUSA, Inc., 587 F.3d 1324 (Fed. Cir. 2009)	16
Phillips v. AWH Corp., 415 F.3d 1303 (Fed. Cir. 2003)	5
Sundance, Inc. v. Demonte Fabricating, Ltd., 550 F.3d 1356 (Fed. Cir. 2008)	16
<u>Statutes</u> 35 U.S.C. § 102	19
35 U.S.C. § 103	1, 20
Regulations 37 C F R & 42 105	1



	Petitioner's Reply Brief in IPR2017-02021 (U.S. Patent No. 6,	,243,315)
37 C.F.R.	§ 42.24(d)	21
37 C F R	8 42 6(e)	1



LIST OF EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 6,243,315
1002	Declaration of Dr. Andrew Wolfe
1003	Curriculum Vitae of Dr. Andrew Wolfe
1004	U.S. Patent No. 6,327,664 to Dell, issued December 4, 2001
1005	U.S. Patent No. 5,590,082 to Abe, issued December 31, 1996
1006	JESD21-C: JEDEC Configurations for Solid State Memories,
	Release 7, Published January 1997
1007	Declaration of John R. Kelly Regarding Records of JEDEC
1008	U.S. Patent No. 6,172,928 to Ooishi, issued August January 9, 2001
1009	U.S. Patent No. 6,144,219 to Palaniswami, issued November 7,
	2000
1010	Micron MT48LC4M4R1(S) Functional Specification, 1994
1011	Micron MT48LC4M4A1/A2 S Datasheet, 1998
1012	U.S. Patent No. 4,005,395 to Fosler, Jr. et al. issued January 25,
	1977



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

