

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Intel Incorporated
Petitioner

v.

Qualcomm Incorporated
Patent Owner

Case IPR2018-01334¹
Patent 8,838,949

**PATENT OWNER RESPONSE TO PETITION FOR *INTER PARTES*
REVIEW PURSUANT TO 37 C.F.R. § 42.220**

¹ IPR2018-01335 and IPR2018-01336 have been consolidated with the instant proceeding.

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Pursuant to the Board’s Institution Decisions in IPR2018-01334, -01335, and -01336 (Paper 10 in each proceeding, entered March 18, 2019), Patent Owner Qualcomm, Inc. (“Qualcomm” or “Patent Owner”) submits this response in opposition to the Petitions for *Inter Partes* Review of U.S. Patent No. 8,838,949 (the “’949 patent”) filed by Intel Incorporated (“Intel” or “Petitioner”).

I. INTRODUCTION

The ’949 patent describes and claims improved systems for loading a data image from a first “primary” processor onto a target “secondary” processor. The patent describes that in prior-art approaches, a data image is loaded to a secondary processor using an intermediate buffering step, where data is transferred into a temporary buffer of the system memory and then loaded into “target locations” of the system memory. Ex. 1001² at 2:17-34. The ’949 patent improves upon the conventional technology by providing “a direct scatter load technique” for loading an image from a primary processor to a secondary processor without using “the intermediate step of buffering required in traditional loading processes.” *Id.* at 4:43-47; 7:20-26. The ’949 patent refers to this as a “Zero Copy Transport Flow” and describes the technique in detail. *Id.* at 7:16-12:57.

² All citations to Petitioner’s exhibits herein refer to the exhibits listed in Petitioner’s Consolidated Exhibit List (Paper 14), as filed in IPR2018-01334.

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