UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION and HP INC.,
Petitioner

v.

SYNKLOUD TECHNOLOGIES, LLC,
Patent Owner

Case IPR2020-01031
U.S. Patent 10,015,254

Synkloud Technologies, LLC.'s Patent Owner Response

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a. download a file from a second server across a network into the remote storage space through utilizing information for the file cached in the cache storage in the wireless device (independent claims 1 and 16). 10

V. THE PETITIONERS FAILED TO DEMONSTRATE BY A PREPONDERANCE OF THE EVIDENCE THAT ANY OF THE CHALLENGED CLAIMS WOULD HAVE BEEN OBVIOUS ON ANY INSTITUTED GROUND. 11

A. Independent Claims 1 And 16 As Well As The Claims Dependent Therefrom Would Not Have Been Obvious Over McCown In Combination With The Secondary References (Proposed Grounds 1 and 2). 15

1. The Combination Of McCown and Dutta (Ground 1) Would Not Have Taught "download[ing] a file from a second server across a network into the remote storage space through utilizing information for the file cached in a cache storage in the wireless device," As Recited in Independent Claim 1, and As Similarly Recited In Independent Claim 16. 18

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2. The Combination of McCown and Dutta (Ground 1) Would Not Have Taught "transmitting the information for the file cached in the wireless device to the first server to cause the first server, in accordance with the information for the file, to download the file from the second server into the remote storage space," As Recited in Dependent Claim 2 And As Similarly Recited In Dependent Claim 17. 31

3. The Petitioners Failed To Show That A POSITA Would Have Been Motivated To Modify McCown With Dutta To Achieve The Particular Device And Method Recited In Independent Claims 1 and 16 Of The '254 Patent Respectively With A Reasonable Expectation Of Success. 37

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