

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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MICROSOFT CORPORATION and HP INC.  
Petitioners,

v.

SYNKLOUD TECHNOLOGIES, LLC,  
Patent Owner.

Patent No. 10,015,254  
Issued: July 3, 2018  
Filed: December 21, 2015

Inventor: Sheng Tai Tsao

Title: SYSTEM AND METHOD FOR WIRELESS DEVICE ACCESS TO  
EXTERNAL STORAGE

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*Inter Partes* Review No. IPR2020-01032

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**PETITION**  
**REGARDING U.S. PATENT NO. 10,015,254**

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## I. INTRODUCTION

U.S. Patent No. 10,015,254 (“the 254 Patent”) claims a system and method for a wireless device to interact with a remote storage server for remote storage of files. McCown, a PCT application published more than a year before the priority date of the 254 Patent, describes exactly such a system and method. In particular, McCown discloses a user site, which can be, for example, an enhanced cellular telephone, that can manipulate a remote site and a storage site in order to cause a file to be downloaded from the remote site and thereby stored in the storage site.

While the 254 Patent mentions a “cache” only once, its claims have several limitations directed to “*cache storage*.” While a Skilled Artisan would understand McCown’s Internet-based system to employ a cache storage, to remove any doubt and to simplify the issues before the Board, this petition is based on the obvious combination of McCown and Dutta, a prior art published patent application directed to the capture and subsequent remote storage of web content using a web cache.

Finally, several dependent claims are drawn to certain low-level functionality for manipulating files stored remotely, such as moving, copying or deleting. A prior art patent to Coates discloses exactly that functionality in great detail. As demonstrated below and in the exhibits filed herewith, the combination

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