

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 IPR2020-01032
U.S. Patent 10,015,254

Synkcloud Technologies, LLC.'s Patent Owner Preliminary Response Pursuant
To 37 C.F.R. § 42.107(a)

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 B. Independent Claim 9 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)..... 16

 1. The Combination Of McCown and Dutta (Ground 1) Would Not Have Taught “downloading a file from a remote server across a network into the first one of the storage spaces through utilizing information for the file cached in a cache storage in the first wireless device,” As Recited in Independent Claim 9. 18

 2. The Combination of McCown and Dutta (Grounds 1 and 2) Would Not Have Taught “receiving the information for the file from the first wireless device, and sending a request of downloading the file to the remote server according to the information for the file received,” As Recited in Dependent Claim 10. 21

 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 Claim 9 Of The '254 Patent With A Reasonable Expectation Of Success. 27

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PATENT OWNER'S EXHIBIT LIST

<u>Exhibit Number</u>	<u>Description</u>
2001	Declaration of Zaydoon Jawadi
2002	Curriculum Vitae of Zaydoon Jawadi

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