

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION and HP INC.,
Petitioners

v.

SYNKLOUD TECHNOLOGIES, LLC,
Patent Owner

Case IPR2020-01269
U.S. Patent 9,219,780

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

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 B. The '780 Patent: Mr. Sheng Tai Tsao Invents An Approach For Downloading Data From A Web Site To A Remote Storage Server Using Download Information Stored In The Cache Of A Wireless Device. 5

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 A. downloading a file from a remote server across the Internet into the storage space through utilizing download information for the file, including name of the file and internet protocol ("IP") address of the remote server, cached in the cache storage (independent claims 1 and 16)..... 10

V. THE PETITIONERS FAILED TO DEMONSTRATE THEY ARE REASONABLY LIKELY TO PREVAIL ON ANY OF THEIR PROPOSED OBVIOUSNESS GROUNDS..... 12

 A. The Petitioners Failed To Set Forth A Proper Obviousness Analysis 15

 B. 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)..... 17

 1. The Combination Of McCown and Dutta (Ground 1) Would Not Have Taught "downloading a file from a remote server across the Internet into the storage space through utilizing download information for the file ... cached in the cache storage," of the wireless device As Recited in Independent Claim 1 and As Similarly Recited in Independent Claim 16. 20

 2. The Combination of McCown and Dutta (Ground 1) Would Not Have Taught "transmitting the downloading information [obtained for a file from a remote server] cached in the wireless device to the storage server," As Recited in Dependent Claim 3 And As Similarly Recited In Dependent Claim 17..... 23

 3. The Petitioners Failed To Show That A POSITA Would Have Been Motivated To Modify McCown With Dutta To Achieve A Device "downloading a file from a remote server across the Internet into the storage space through utilizing download information for the file ... cached in the cache storage," of the wireless device As Recited In

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