# 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.

Patent No. 9,219,780 Issued: December 22, 2015 Filed: February 16, 2015

Inventor: Sheng Tai Tsao

**REGARDING U.S. PATENT NO. 9,219,780** 



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#### I. INTRODUCTION

U.S. Patent No. 9,219,780 ("the 780 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 before the priority date of the 780 Patent, describes such a system and method. In particular, McCown discloses a user site, which can be 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 780 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, 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 <u>Coates</u> discloses exactly that functionality in great detail. As demonstrated below and in the exhibits filed herewith, the combination of these prior art references renders claims 1-8 and 16-20 of the 780 Patent unpatentable for obviousness.



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