

**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.

U.S. Patent No. 9,219,780  
Inventor: Sheng Tai Tsao

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

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Case IPR2020-01269

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**PETITIONERS' REPLY BRIEF**

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## I. INTRODUCTION

The Petition demonstrated it would have been obvious to combine a prior art browser cache, a device known to be used for storing web pages, with the system of McCown in order to store a webpage of URLs. Synkcloud's response asserts a scattershot of unsupported and mostly unexplained arguments that ignore the actual analysis of the Petition and the disclosures of the prior art. Those arguments should be rejected.

Moreover, the Board has recently rejected many of the arguments Synkcloud asserts here in a final written decision concerning a related patent sharing the same specification and nearly identical claim language as at issue here. *See Microsoft Corp. v. Synkcloud Techs., LLC*, IPR2020-00316, Paper 43 (June 14, 2021) (“the 316 FWD”). Synkcloud should therefore be estopped from making these arguments here, as doing so would be “taking action inconsistent with the adverse judgment” in the 316 FWD, in contravention of 37 C.F.R. § 42.73(d)(3).

## II. ARGUMENT

### A. Synkcloud's Claim Construction Is Legally Erroneous

#### 1. Utilizing download information

Synkcloud argues for a construction of the phrase “*download a file from a remote server ...*,” POR, 8-13, which is nearly identical to the Board's interpretation of the “*utilizing information ...*” portion of that same claim language,

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