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 IPR2020-01270
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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A. Prior Art Storage Systems 4

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

III. PETITIONERS' PROPOSED GROUNDS FOR REVIEW 8

IV. CLAIM CONSTRUCTION. 9

A. Download[ing] a file from a remote server into the first one of the storage spaces through utilizing download information for the file, including name of the file and internet protocol ("IP") address of the remote server, cached in a cache storage of the first wireless device (independent claim 9). 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 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). 17

1. The Combination Of McCown and Dutta (Ground 1) Would Not Have Taught "download[ing] a file from a remote server into the first one of the storage spaces through utilizing download information for the file … cached in a cache storage of the first wireless device,"As Recited in Independent Claim 9. 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 first wireless device to the server" As Recited in Dependent Claim 10. 23

3. The Petitioners Failed To Show That A POSITA Would Have Been Motivated To Modify McCown With Dutta To Achieve A Device "download[ing] a file from a remote server into the first one of the storage spaces through utilizing download information for the file … cached in a cache storage of the first wireless device," As Recited In Independent Claim 9 And Reasonably Expect Success. 29

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