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

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

Inter Partes Review No. IPR2020-01270

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

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TABLE OF CONTENTS

I. INTRODUCTION 1

II. INTER PARTES REVIEW COMPLIANCE 2

A. Certification (37 C.F.R. § 42.104 (a)) 2

B. Mandatory Notices (§ 42.8(b)) 2

C. No Basis Exists for Discretionary Denial Under Section 314 (a) 3

III. IDENTIFICATION OF CHALLENGED CLAIMS 4

IV. THE CONTESTED PATENT 4

A. Effective Filing Date 4

B. Level of Ordinary Skill 4

C. Overview of 780 Patent 5

D. Claim Construction 7

1. "cache storage . . ." 7

2. "utilizing download information . . ." 10

3. "folder structure" 12

4. "pool of a plurality of storage spaces" 12

V. THE PRIOR ART (EX1005) 13

A. McCown (EX1005) 13

B. Dutta (EX1006) 14

C. Coates (EX1007) 15

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VI. REASONS FOR REQUESTED RELIEF 16

A. The Challenged Claims Are Unpatentable Over McCown in View of Dutta 16

1. Claim 9 16

2. Claim 10 54

3. Claim 12 58

4. Claim 13 60

5. Claim 15 61

B. The Challenged Claims Are Unpatentable Over McCown in View of Dutta, in Further View of Coates 62

1. Claim 9 62

2. Claim 10 70

3. Claim 11 71

4. Claim 12 72

5. Claim 13 72

6. Claim 14 72

7. Claim 15 74

VII. CONCLUSION 74

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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 Coates 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 9-15 of the 780 Patent unpatentable for obviousness.

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II. INTER PARTES REVIEW COMPLIANCE

A. Certification (37 C.F.R. § 42.104 (a))

Petitioners certify that the 780 Patent for which review is sought is available for *inter partes* review and Petitioners are not barred or estopped from requesting *inter partes* review of the 780 Patent (EX1001) on the grounds identified in this Petition. 37 C.F.R. § 42.104 (a). Petitioners also certify this petition for *inter partes* review is not being filed more than one year from the date of service of a complaint on Petitioners alleging infringement of a patent. Petitioners also certify that they have not filed a civil action challenging the validity of a claim of the 780 Patent.

B. Mandatory Notices (§ 42.8(b))

The real parties-in-interest of this petition are Microsoft Corporation ("Microsoft"), located at One Microsoft Way, Redmond, WA 98052, and HP Inc. ("HP"), located at 1501 Page Mill Road, Palo Alto, CA 94304.

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