# 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. 9,239,686 Issued: January 19, 2016 Filed: September 25, 2013

Inventor: Sheng Tai Tsao

Title: METHOD AND APPARATUS FOR WIRELESS DEVICE ACCESS TO EXTERNAL STORAGE
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Inter Partes Review No. IPR2020-01271

PETITION REGARDING U.S. PATENT NO. 9,239,686

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#### I. INTRODUCTION

U.S. Patent No. 9,239,686 ("the 686 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 686 Patent, describes exactly such a system and method. In particular, McCown discloses a user site, which can be, for example, 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 a Skilled Artisan would understand McCown's Internet-based system to employ a cache storage, to remove any doubt and to simplify the issues before the Board, 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, the combination of these prior art references renders claims 1-20 of the 686 Patent unpatentable for obviousness.

# II. COMPLIANCE WITH REQUIREMENTS FOR INTER PARTES REVIEW

A. Certification the 686 Patent May Be Contested by Petitioners



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