UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADOBE INC.,
Petitioner

v.

SYNKLOUD TECHNOLOGIES, LLC,
Patent Owner

Case IPR2020-01392
U.S. Patent 9,239,686

SynKloud Technologies, LLC's Patent Owner Response

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B. The '686 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. 3

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IV. CLAIM CONSTRUCTION. 7

a. download a file from a remote server across a network into the first one of the storage spaces through utilizing download information for the file cached in the first wireless device (independent claim 1). 7

b. Allocate exclusively a second one of the storage spaces of a predefined capacity to a user of a second wireless device (dependent claim 9). 12

V. THE PETITIONER FAILED TO DEMONSTRATE BY A PREPONDERANCE OF THE EVIDENCE THAT ANY OF THE CHALLENGED CLAIMS WOULD HAVE BEEN OBVIOUS ON ANY INSTITUTED GROUND. 13

A. Independent Claim 1 As Well As The Claims Dependent Therefrom Would Not Have Been Obvious Over Prust In Combination With The Secondary References. 15

1. The Combination Of Prust with Either Major or Kraft Would Not Have Taught "download[ing] a file from a remote server across a network into the first one of the storage spaces through utilizing download information for the file cached in the first wireless device," As Recited in Independent Claim 1. 17

2. The Petitioner Failed To Show That A POSITA Would Have Been Motivated To Modify Prust With Either Major or Kraft To Achieve The Particular Device Recited In Independent Claim 1 Of The '686 Patent With A Reasonable Expectation Of Success. 28

3. Dependent Claim 9 Would Not Have Been Obvious Over Prust Alone Or In Combination With The Secondary References. 38

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B. Independent Claim 1 As Well As The Claims Dependent Therefrom Would Not Have Been Obvious Over Nomoto In Combination With The Secondary References. 41

1. The Combination Of Nomoto with Either Major or Kraft Would Not Have Taught "download[ing] a file from a remote server across a network into the first one of the storage spaces through utilizing download information for the file cached in the first wireless device," As Recited in Independent Claim 1. 42

2. Petitioner Failed To Show That A POSITA Would Have Been Motivated To Modify Nomoto With Either Major or Kraft To Achieve The Particular Device Recited In Independent Claim 1 Of The '686 Patent With A Reasonable Expectation Of Success. 44

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35 U.S.C. §312(a)(3) 18

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37 C.F.R. §42.107 i

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PATENT OWNER'S EXHIBIT LIST

Exhibit Number	Description
2001	Declaration of Zaydoon Jawadi
2002	Curriculum Vitae of Zaydoon Jawadi
2003	Hypertext Transfer Protocol -- HTTP/1.1, rfc2616, June 1999.
2004	Microsoft Computer Dictionary, 5th Edition.
2005	Dictionary Definitions of Predefine, Merriam-Webster Dictionary, Oxford Dictionary, Cambridge Dictionary.
2006	Patrick Turner's Industrial Automation Dictionary, 1st Edition.
2007	Maxmillan Dictionary Of Information Technology, Third Edition
2008	Claim Chart of wireless devices with Microsoft OneDrive
2009	Claim Chart of wireless devices with Adobe cloud services
2010	Claim Chart of wireless devices with Dropbox cloud services
2011	Claim Chart of wireless devices with Microsoft OneDrive
2012	Claim Chart of wireless devices with Microsoft OneDrive for the '686 Patent
2013	Reserved
2014	Second Declaration of Jaydoon Jawadi
2015	Claim Chart of the HP Laptop computers with Microsoft OneDrive
2016	Claim Chart of wireless devices with Microsoft OneDrive
2017	Microsoft Securities and Exchange Commission Form 10K filing for the fiscal year ending June 30, 2019
2018	https://blog.goptg.com/microsoft-office-365-statistics, last viewed September 15, 2020

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