

Case IPR2020-01492 & IPR2021-00702
U.S. Patent No. 6,651,134

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INC.,
and STMICROELECTRONICS, INC.
Petitioners

v.

MONTEREY RESEARCH, LLC,
Patent Owner

Case IPR2020-01492
&
IPR2021-00702¹

U.S. Patent No. 6,651,134
Title: MEMORY DEVICE WITH FIXED LENGTH NON
INTERRUPTIBLE BURST
Issue Date: November 18, 2003

MONTEREY RESEARCH, LLC NOTICE OF APPEAL

Mail Stop Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

¹ IPR2021-00702 was joined with IPR2020-01492 and resolved in a single Final Written Decision from which this appeal arises.

Case IPR2020-01492 & IPR2021-00702

U.S. Patent No. 6,651,134

Pursuant to 35 U.S.C. §§ 141, 142, and 319, and in accordance with 37 C.F.R. §§ 90.2-90.3, Patent Owner Monterey Research, LLC (“Monterey”) appeals to the United States Court of Appeals for the Federal Circuit from the Final Written Decision of the Patent Trial and Appeal Board (“Board”) entered on March 4, 2022 in IPR2020-01492 (Paper No. 33) and the same decision entered on March 4, 2022 in IPR2021-00702 (Paper 10), which was joined with IPR2020-001492 (the “Final Written Decision”), and from all underlying findings, determinations, rulings, opinions, orders, and decisions regarding the *inter partes* review (Cases IPR2020-01492 and IPR2021-00702) of U.S. Patent No. 6,651,134 (the “’134 Patent”).

In accordance with 37 C.F.R. § 90.2(a)(3)(ii), Monterey states that the issues on appeal include, but are not limited to: the Board’s determination that Claims 1-7 and 9-21 of the ’134 Patent have been shown to be unpatentable; the Board’s construction of those claims; the Board’s consideration of the expert testimony, prior art, and other evidence in the record; and the Board’s factual findings, conclusions of law, or other determinations supporting or related to those issues, as well as all other issues decided adversely to Monterey in any orders, decisions, rulings, and opinions.

This Notice of Appeal is being e-filed with the Clerk’s Office for the United States Court of Appeals for the Federal Circuit, along with payment of the required docketing fees. In addition, a copy of this Notice of Appeal is being filed

Case IPR2020-01492 & IPR2021-00702

U.S. Patent No. 6,651,134

simultaneously with the Patent Trial and Appeal Board and with the Director of the
United States Patent and Trademark Office.

Dated: May 6, 2022

Respectfully submitted,

/s/ Kayvan B. Noroozi

Kayvan B. Noroozi

NOROOZI PC

11601 Wilshire Boulevard

Suite 2170

Los Angeles, CA 90025

Telephone: (310) 975-7074

Facsimile: (844) 975-7074

Counsel for Appellant

Monterey Research, LLC

Case IPR2020-01492 & IPR2021-00702
U.S. Patent No. 6,651,134

CERTIFICATE OF FILING

The undersigned certifies that on May 6, 2022, in addition to filing the foregoing electronically through PTAB E2E, a copy of this Notice of Appeal was deposited with Priority Mail Express on May 6, 2022 for filing with the Director of the United States Patent and Trademark Office, at the following address:

Director of the United States Patent and Trademark Office
c/o Office of the General Counsel
Mail Stop 8
P.O. Box 1450
Alexandria, VA 22313-1450

The undersigned also certifies that on May 6, 2022, a copy of this Notice of Appeal was filed electronically through the United States Court of Appeals for the Federal Circuit's CM/ECF system.

Dated: May 6, 2022

Respectfully submitted,

/s/ Kayvan B. Noroozi
Kayvan B. Noroozi
NOROOZI PC
11601 Wilshire Boulevard
Suite 2170
Los Angeles, CA 90025
Telephone: (310) 975-7074
Facsimile: (844) 975-7074

*Counsel for Appellant
Monterey Research, LLC*

Case IPR2020-01492 & IPR2021-00702
U.S. Patent No. 6,651,134

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e), the undersigned certifies that on May 6, 2022, a complete copy of the foregoing was served on counsel of record for all parties by filing this document through PTAB E2E, by filing this and by sending this document via electronic mail to the following addresses:

Eagle H. Robinson
Daniel S. Leventhal
Richard S. Zembek
Norton Rose Fulbright US LLP
eagle.robinson@nortonrosefulbright.com
daniel.leventhal@nortonrosefulbright.com
richard.zembek@nortonrosefulbright.com

Tyler R. Bowen
Roque Thuo
Perkins Coie LLP
bowen-ptab@perkinscoie.com
thuo-ptab@perkinscoie.com

Dated: May 6, 2022

Respectfully submitted,

/Theodoros Konstantakopoulos/
Theodoros Konstantakopoulos, Ph.D.
(Reg. No. 74,155)
tkonstantakopoulos@desmaraisllp.com
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Telephone: 212-351-3400
Facsimile: 212-351-3401

*Counsel for Patent Owner
Monterey Research, LLC*