IPR2021-00174 U.S. Patent No. 7,870,225

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 IPR2021-00174 U.S. Patent 7,870,225

SynKloud Technologies, LLC's Patent Owner Preliminary Response Pursuant To 37 C.F.R. § 42.107(a)

DOCKET

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| a. | virtual host bus adapter (independent claim 1)10 | | |
| b. | enumerating NAD that are available over the network (independent claim 1) | | |
| V. | THE PETITIONERS FAILED TO DEMONSTRATE THEY ARE REASONABLY LIKELY TO PREVAIL ON ANY OF THEIR PROPOSED UNPATENABILITY GROUNDS AGAINST ANY CLAIM | | |
| A. | The Petitioners Failed To Show That Any Claim Of The '225 Patent Is Anticipated By Jewett | | |
| | Jewett Does Not Disclose A "virtual host bus adapter," As Recited in Independent Claim 1 | | |
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| | 2. Jewett Does Not Disclose A "device driver creating a virtual host bus adapter," As Recited in Independent Claim 1 | | |
| | 3. Jewett Does Not Disclose "the virtual host bus adapter controlling the NAD in a way indistinguishable from the way as a physical host bus adapter device controls device so that the host recognizes the NAD," As Recited in Independent Claim 1 | | |
| | 4. Jewett Does Not Disclose A "device driver enumerating NAD that are available over the network, not directly attached to the host internal system bus," As Recited in Independent Claim 1 | | |
| B. | The Petitioners Failed To Show That Any Claim Of The '225 Patent Would Have Been Obvious | | |
| | 1. Petitioners Failed To Show That Any Claim Of The '225 Patent Would Have Been Obvious Over Jewett Alone | | |

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| | 2. | | Petitioners Failed To Show That Claim 1 Of The '225 Patent Would Have Been Obvious Over Jewett In Combination With The Secondary References | 29 |
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