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		
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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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