UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADVANCED MICRO DEVICES, INC., STMICROELECTRONICS, INC.,

Petitioner,

v.

MONTEREY RESEARCH, LLC,

Patent Owner.

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,651,134

DOCKET A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

TABLE OF CONTENTS

Page

I.	INT	RODUCTION	1
II.	MA	NDATORY NOTICES UNDER 37 C.F.R. §42.8	3
III.	FEE	AUTHORIZATION	4 <u>5</u>
IV.	GRO	OUNDS FOR STANDING	
V.	PRE	CISE RELIEF REQUESTED	5
VI.	THE	E CHALLENGED PATENT	<u>67</u>
VII.	PAT	ENT PROSECUTION HISTORY	<u>910</u>
VIII.	LEV	EL OF ORDINARY SKILL IN THE ART	<u>1112</u>
IX.	CLA	AIM CONSTRUCTION	<u>1213</u>
	А.	"non-interruptible" (claims 1, 16, 17)	<u>1213</u>
	В.	"means for reading data / means for generating a predetermined number of said internal address signals" (claim 16)	n 13<u>14</u>
	C.	"external address signal" (claims 1, 13, 15-17)	
	D.	"burst" (claim 2)	<u>1617</u>
	E.	"internal address signal" (claims 1, 2, 12, 15-17)	
	F.	"logic circuit" (claims 1, 12)	<u>1617</u>
	G.	"predetermined number of [said] internal address signals" (claims 1-4, 12, 15-17)	<u>-1617</u>
	Н.	"memory" (claims 1, 8-9, 14, 17)	
	I.	"address signal" (claims 1-4, 10-13, 16-17)	<u>1718</u>
Х.	SPE	CIFIC EXPLANATION OF GROUNDS	<u>1819</u>
	A.	Ground 1: Claims 1-3, 8, 12-13, 16, and 17 are anticipated by US 6,115,280 ("Wada")	
		1. Wada	1010
		2. Independent Claim 1	<u>2425</u>

TABLE OF CONTENTS (continued)

	3.	Dependent Claim 2	<u>3132</u>
	4.	Dependent Claim 3	<u>3334</u>
	5.	Dependent Claim 8	35
	6. —	- Dependent Claim 12	36
	7.<u>6.</u>	Dependent Claim <u>1312</u>	37
	<u>7.</u>	Dependent Claim 13	<u>38</u>
	8.	Independent Claim 16	
	9.	Independent Claim 17	
В.		nd 2: Claims 1-4, 8, 12-14, 16, and 17 are obvious over in view of the knowledge of a POSITA	_47 <u>48</u>
	1.	Independent Claims 1 and 16	<u>4748</u>
	2.	Dependent Claims 2-3, 8, 12-13, and 17	<u>4849</u>
	3.	Dependent Claim 4	
	4.	Dependent Claim 14	
C.	obvio	nd 2a: Claims 1-4, 8, 12-14, 16, and 17 are rendered us by the combination of Wada and US 5,584,033 rett") in view of the knowledge of a POSITA	50<u>51</u>
	(Dai	rett") in view of the knowledge of a POSITA Barrett	<u>5051</u>
	1. 2.	Claims 1-4, 8, 12-14, 16, and 17	<u>5354</u>
D.	Groun comb	nd 3: Claims 4-7, and 18-20 are rendered obvious by the ination of Wada and U.S. 6,185,149 ("Fujioka") in view knowledge of a POSITA.	<u>5455</u>
	1.	Fujioka	<u>5455</u>
	2.	Dependent Claim 4	<u>_5859</u>
	3.	Dependent Claim 5	<u>5960</u>
	4.	Dependent Claim 6	<u>5960</u>

DOCKET

TABLE OF CONTENTS (continued)

	5.	Dependent Claim 7	<u>6061</u>
	6.	Dependent Claim 18	<u>6162</u>
	7.	Dependent Claim 19	<u>6162</u>
	8.	Dependent Claim 20	<u>6162</u>
E.	the co	nd 3a: Claims 4-7, and 18-20 are rendered obvious by ombination of Wada, Barrett, and Fujioka in view of the ledge of a POSITA.	<u>6162</u>
F.	the co	nd 4: Claims 9-10, 14, and 21 are rendered obvious by ombination of Wada and US 6,226,755 ("Reeves") in of the knowledge of a POSITA	<u>6263</u>
	1.	Reeves	<u>6263</u>
	2.	Dependent Claim 9	<u>6566</u>
	3.	Dependent Claim 10	<u>6667</u>
	4.	Dependent Claim 14	<u>6667</u>
	5.	Dependent Claim 21	<u>6768</u>
G.	the co	nd 4a: Claims 9-10, 14, and 21 are rendered obvious by ombination of Wada, Barrett, and Reeves in view of the ledge of one of ordinary skill in the art	67<u>68</u>
H.	comb	nd 5: Claims 11 and 15 are rendered obvious by the ination of Wada and US 5,784,331 ("Lysinger") in view knowledge of one of ordinary skill in the art	<u></u>
	1.	Lysinger	<u>6869</u>
	2.	Dependent Claim 11	<u></u>
	3.	Dependent Claim 15	<u></u>
I.	comb	nd 5a: Claims 11 and 15 are rendered obvious by the ination of Wada, Barrett, and Lysinger in view of the ledge of one of ordinary skill in the art	75 76
CON	CLUS	· ·	75<u>76</u>

XI.

DOCKE.

Α

EXHIBIT LIST

Ex-1001	U.S. Patent No. 6,651,134
Ex-1002	Declaration of Dr. R. Jacob Baker
Ex-1003	Curriculum Vitae of Dr. R. Jacob Baker
Ex-1004	Prosecution History of U.S. Patent No. 6,651,134
Ex-1005	U.S. Patent No. 6,115,280 ("Wada")
Ex-1006	U.S. Patent No. 6,185,149 ("Fujioka")
Ex-1007	U.S. Patent No. 5,900,021 ("Tiede")
Ex-1008	U.S. Patent No. 6,226,755 ("Reeves")
Ex-1009	U.S. Patent No. 5,748,331 ("Lysinger")
Ex-1010	U.S. Patent No. 5,584,033 ("Barrett")
Ex-1011	Order 29 Construing Claims, Inv. No. 337-TA-792, U.S.I.T.C (February 9, 2012)
Ex-1012	Order Construing Claims, Cypress Semiconductor Corp. v. GSU Tech., Inc., 13-cv-02013-JST (N.D. Cal.) (July 29, 2014)
Ex-1013	Commission Opinion, Inv. No. 337-TA-792, U.S.I.T.C. (June 28, 2013)
Ex-1014	U.S. Patent No. 5,360,992 ("Lowrey")
<u>Ex-1015</u>	Comparison between the current Petition and petition in IPR2020-00985

DOCKET

DOCKET A L A R M



Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.