#### UNITED STATES PATENT AND TRADEMARK OFFICE

#### BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICRON TECHNOLOGY, INC., Petitioner,

v.

VERVAIN, LLC, Patent Owner.

Case No.: IPR2021-01547 U.S. Patent No. 8,891,298 Original Issue Date: November 18, 2014

Title: LIFETIME MIXED LEVEL NON-VOLATILE MEMORY SYSTEM

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,891,298 PURSUANT TO 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42



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		b.	[1.A] "at least one MLC non-volatile memory module comprising a plurality of individually erasable blocks;"	. 29
		c.	[1.B] "at least one SLC non-volatile memory module comprising a plurality of individually erasable blocks; and"	. 31
		d.	[1.C] "a controller coupled to the at least one MLC non- volatile memory module and the at least one SLC non- volatile memory module wherein the controller is adapted to:"	. 33
		e.	[1.D] "maintain an address map of at least one of the MLC and SLC non-volatile memory modules, the address map comprising a list of logical address ranges accessible by a computer system, [1.D.ii.] the list of logical address ranges having a minimum quanta of addresses, [1.D.iii.] wherein each entry in the list of logical address ranges maps to a similar range of physical addresses within either the at least one SLC non-volatile memory module or within the at least one MLC non-volatile memory module;"	. 35

	f.	[1.E] "[1.E.i] determine if a range of addresses listed by an entry and mapped to a similar range of physical addresses within the at least one MLC non-volatile memory module, fails a data integrity test, and, [1.E.ii] in the event of such a failure, the controller remaps the entry to the next available equivalent range of physical addresses within the at least one SLC non-volatile memory module;"	
	g.	[1.F] "determine which of the blocks of the plurality of the blocks in the MLC and SLC non-volatile memory modules are accessed most frequently by maintaining a count of the number of times each one of the blocks is accessed; and"	
	h.	[1.G] "allocate those blocks that receive the most frequent writes by transferring the respective contents of those blocks to the at least one SLC non-volatile memory module."	
	2.	Claim 2: "The system of claim 1, wherein the minimum quanta of addresses is equal to one block."	
	3.	Claim 3: "The system of claim 1, wherein the minimum quanta of addresses is equal to one page."	
	4.	Claim 4: "The system of claim 1, wherein the MLC non-volatile memory module is NAND flash memory."	
	5.	Claim 5: "The system of claim 1, wherein the SLC non-volatile memory module is NAND flash memory."	
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	1.	Claim 1	
	a.	[1.PRE] "A system for storing data comprising:" 52	
	b.	[1.A] "at least one MLC non-volatile memory module comprising a plurality of individually erasable blocks;"	

C.	[1.B] "at least one SLC non-volatile memory module comprising a plurality of individually erasable blocks; and" 54
d.	[1.C] "a controller coupled to the at least one MLC non- volatile memory module and the at least one SLC non- volatile memory module wherein the controller is adapted to:"
e.	[1.D] "maintain an address map of at least one of the MLC and SLC non-volatile memory modules, the address map comprising a list of logical address ranges accessible by a computer system, the list of logical address ranges having a minimum quanta of addresses, wherein each entry in the list of logical address ranges maps to a similar range of physical addresses within either the at least one SLC non- volatile memory module or within the at least one MLC non-volatile memory module;"
f.	[1.E] "determine if a range of addresses listed by an entry and mapped to a similar range of physical addresses within the at least one MLC non-volatile memory module, fails a data integrity test, and, in the event of such a failure, the controller remaps the entry to the next available equivalent range of physical addresses within the at least one SLC non-volatile memory module;"
g.	[1.F] "determine which of the blocks of the plurality of the blocks in the MLC and SLC non-volatile memory modules are accessed most frequently by maintaining a count of the number of times each one of the blocks is accessed"
h.	<ul><li>[1.G] "allocate those blocks that receive the most frequent writes by transferring the respective contents of those blocks to the at least one SLC non-volatile memory module;"</li></ul>
2.	Claim 2: "The system of claim 1, wherein the minimum quanta of addresses is equal to one block."
3.	Claim 3: "The system of claim 1, wherein the minimum quanta of addresses is equal to one page."
4.	Claim 4: "The system of claim 1, wherein the MLC non- volatile memory module is NAND flash memory."

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