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



Page

TABLE OF CONTENTS

INTR	INTRODUCTION1				
REQUIREMENTS FOR PETITION FOR INTER PARTES REVIEW2					
A.	Grounds for Standing (37 C.F.R. § 42.104(a))				
B.	Notice of Lead and Backup Counsel and Service Information (37 C.F.R. §§ 42.8(b)(3-4), 42.10(a))				
C.	Notic	e of Real Party-in-Interest (37 C.F.R. § 42.8(b)(1))	4		
D.	Notice of Related Matters (37 C.F.R. § 42.8(b)(2))4				
Е.	Fee fo	or Inter Partes Review	5		
F.	Proof	of Service	5		
	NTIFICATION OF CLAIMS BEING CHALLENGED (37 C.F.R. 104(B))				
THE BOARD SHOULD NOT EXERCISE ITS DISCRETION TO DENY INSTITUTION					
A.			7		
B.	Petiti	oner's Arguments Are Not Duplicative	12		
THE 298 PATENT					
A.	Tech	nological Background	13		
	1.	Volatile, Non-volatile, and Flash Memory	13		
	2.	Programming Flash, and SLC and MLC Flash Memory Cells	14		
	3.	Flash Architecture	15		
	4.	Logical Addresses, Physical Addresses, Bad Block Replacement, and Wear Leveling	16		
	5.	Speed and Wear-Leveling Considerations for MLC and SLC Cells	17		
	6.	Data Integrity Tests	18		
B.	Summ	nary of the 298 Patent's Disclosure	18		
C.	The 2	98 Patent's Prosecution History	21		
	REQUAL A. B. C. D. E. F. IDEN § 42. THE DEN A. B. THE A. B. THE A.	REQUIREMA.GroundB.Notice $(37 C)$ C.Notice $(37 C)$ C.Notice THEF.Fee for Fee for F.F.Proof Fee for F.IDENTIFIC $§ 42.104(B)$ THE BOAR DENTIFIC $§ 42.104(B)$ THE BOAR DENTIFIC $§ 42.104(B)$ A.The F InstituB.Petition 1.A.Technological 1.A.Technological 1.A.5.6.Summer	 REQUIREMENTS FOR PETITION FOR <i>INTER PARTES</i> REVIEW A. Grounds for Standing (37 C.F.R. § 42.104(a))		

VI.	CLA	IM CO	ONSTRUCTION	. 21
	A.	"data	a integrity test" (claim 1)	. 22
	B.	"on a	a periodic basis" (claim 11)	. 23
	C.	Othe	er Terms	. 23
VII.	HOW	/ THE	E CHALLENGED CLAIMS ARE UNPATENTABLE	. 23
	A.	Prior	r Art Overview	. 23
		1.	Dusija	. 23
		2.	Sutardja	. 25
		3.	Moshayedi	. 26
		4.	Li	. 27
	B.	Leve	el of Ordinary Skill in the Art	. 27
	C.		and 1: Dusija And Sutardja In View Of The Knowledge Of A A Renders Obvious Claims 1-5 And 11	. 27
		1.	Claim 1	. 28
		a.	[1.PRE] "A system for storing data comprising:"	. 28
		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."	
	6.	Claim 11: "The system of claim 1, wherein the controller causes the transfer of content on a periodic basis."	
	7.	Motivation to Combine	
D.		Ground 2: Dusija, Sutardja, And Li In View Of The Knowledge Of A POSA Renders Obvious Claims 8-9 Of The 298 Patent	
E.		nd 3: Moshayedi In View Of Dusija And The Knowledge Of SA Render Obvious Claims 1-5 and 11 Of The 298 Patent 51	
	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.	[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."

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