

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD. AND DELL TECHNOLOGIES INC.,
and ANKER INNOVATIONS LTD.,¹
Petitioners,

v.

MYPAQ HOLDINGS LTD.,
Patent Owner.

Case No. IPR2022-00311
Patent 8,477,514

PETITIONERS' REPLY TO PATENT OWNER RESPONSE

¹ Anker Innovations Ltd. filed a motion for joinder and a petition in IPR2022-01134
and has been joined as a petitioner in this proceeding.

TABLE OF CONTENTS

I. INTRODUCTION1

II. CLAIM 1.....1

 A. PO relies on an improper interpretation of “system operational state of said load”1

 B. *Chagny*’s “activity input 202” is a “signal indicating a system operational state of said load”5

 C. *Hwang*’s “standby signal” is a “signal indicating a system operational state of said load”6

III. CLAIM 6.....9

 A. PO relies on an improper interpretation of “a signal characterizing a power requirement”9

 B. *Chagny*’s “activity input 202” characterizes a power requirement of *Chagny*’s processor system.....10

IV. CLAIMS 11 AND 16.....11

 A. *Chagny* and *Hwang* disclose the “enable” and “enabling” elements of claims 11 and 16.....11

 B. *Hwang* discloses the “sensing” element of Claim 16.....14

V. “POWER SYSTEM CONTROLLER”14

 A. *Chagny*’s software program 296 is a “power system controller”14

 B. *Hwang*’s microprocessor is a “power system controller”16

VI. DEPENDENT CLAIMS 2, 7, 12, 1717

 A. *Chagny* discloses the “in accordance with” limitation because duty cycle control depends on switching frequency18

 B. PO identifies the wrong signal in *Hwang*.....21

VII. DEPENDENT CLAIMS 3, 8, 14, 1922

 A. PO improperly interprets “over a period of time”22

 B. *Chagny* and *Hwang* disclose the “over a period of time” limitation23

VIII. DEPENDENT CLAIMS 4 AND 9.....24

 A. *Chagny* and *Hwang* disclose the “core state” limitation24

IX. DEPENDENT CLAIMS 13 AND 18.....25
 A. *Chagny* and *Hwang* disclose the “upon startup” limitation25

X. GROUND 2B-SPECIFIC ARGUMENTS.....27

LIST OF EXHIBITS

1001	U.S. Patent No. 8,477,514 by Artusi et al. (“the ’514 Patent”)
1002	Expert Declaration of Dr. Sayfe Kiaei
1003	Excerpts of the ’514 Patent File History
1004	U.S. Patent No. 6,873,136 to Chagny (“Chagny”)
1005	Reserved
1006	U.S. Patent Application Publication No. 2004/0174152 to Hwang et al. (“Hwang”)
1007	U.S. Patent No. 6,748,545 to Helms (“Helms”)
1008	Comparisons of Claims 11-15 to 16-20 of the ’514 Patent
1009	Ned Mohan et al., <i>Power Electronics: Converters, Applications, and Design</i> (John Wiley & Sons, Inc., New York, 2d Ed. 1995)
1010	MyPAQ’s Preliminary Infringement Contentions, Exhibit 16, served in <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1011	MyPAQ’s Preliminary Infringement Contentions, Exhibit 21, served in <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1012	Alan Grebene, <i>Bipolar and MOS Analog Integrated Circuit Design</i> (John Wiley & Sons, Inc., 1984) (“Grebene”)
1013	MyPAQ’s Preliminary Infringement Contentions, served in <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1014	<i>MyPAQ Holdings Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , No. 21-cv-00398, Dkt. 40 (W.D. Tex. Nov. 29, 2021) (“Scheduling Order”)

1015	S.A. Money, <i>Microprocessor Data Book</i> (Academic Press, Inc., 2 nd ed. 1990)
1016	MyPAQ's Preliminary Infringement Contentions, served in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA
1017	MyPAQ's Preliminary Infringement Contentions, Exhibit 5, served in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA
1018	MyPAQ's Preliminary Infringement Contentions, Exhibit 7, served in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA
1019	April 12, 2022 Email from the Board Authorizing Preliminary Reply and Sur-reply
1020	Dell's Motion to Stay Pending Resolution of Motion for Intra-District Transfer of Venue, filed in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA (Dkt. 43)
1021	MyPAQ's Opposition to Motion to Stay, filed in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA (Dkt. 45)
1022	Transcript of Discovery Hearing held on January 26, 2022 in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA
1023	Email Correspondence Regarding January 26, 2022 Hearing in <i>MyPAQ Holdings, Ltd. v. Dell Technologies Inc. et al.</i> , 6:21-CV-933-ADA as it relates to co-pending case <i>MyPAQ Holdings, Ltd. v. Samsung Electronics Co., Ltd. et al.</i> , 6:21-CV-398-ADA
1024	Andrew T. Dufresne, Nathan K Kelley, & Lori Gordon, <i>How reliable are trial dates relied on by the PTAB in the Fintiv analysis?</i> , Perkins Coie 1600 PTAB & BEYOND, Oct. 29, 2021
1025	Dani Kass, <i>Fintiv Fails: PTAB Uses 'Remarkably Inaccurate' Trial Dates</i> , LAW360, Nov. 2, 2021

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