### UNITED STATES PATENT AND TRADEMARK OFFICE

# BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAMSUNG ELECTRONICS CO., LTD., Petitioner,

v.

NETLIST, INC., Patent Owner.

Case No. IPR2022-00996 Patent No. 11,016,918

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### PATENT OWNER PRELIMINARY RESPONSE

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	B.	Petitioner Has Failed to Provide Competent Evidence that a POSITA Would Have Modified Harris' Memory Module to Have Four Converters		
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		<ol> <li>Petitioner Fails to Present a <i>Prima Facie</i> Case for Using Multiple Converters to Provide Voltages of the Same Level</li></ol>		
		3. Petitioner Fails to Present a <i>Prima Facie</i> Case for Using a Third Buck Converter to Provide V <sub>TT</sub>		
		4. Petitioner Fails to Present a <i>Prima Facie</i> Case for Using a Fourth Buck Converter to Provide V <sub>DDSPD</sub>		
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	Page(s)
Cases	
Cisco Systems, Inc. v. C-Cation Techs., LLC, IPR2014-00454 (PTAB Aug. 29, 2014)	72
In re Enhanced Security Research, LLC, 739 F.3d 1347 (Fed. Cir. 2014)	24, 25, 26, 27
In re Lee, 277 F.3d 1338 (Fed. Cir. 2002)	30
Ex parte Pinon, Appeal 2017/005566 (PTAB, March 9, 2018)	25
South-Tek Sys., LLC v. Engineered Corrosion Sols., LLC, 748 F. App'x. 1003 (Fed. Cir. 2018)	37
TQ Delta, LLC v. Cisco Sys., Inc., 942 F.3d 1352 (Fed. Cir. 2019)	31, 32, 47, 69
Other Authorities	
37 C F R 8 42 6(a)(3)	72.



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