

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,
Petitioner,

v.

LS CLOUD STORAGE TECHNOLOGIES LLC,
Patent Owner.

IPR2023-00120
Patent 10,154,092

PATENT OWNER'S PRELIMINARY
RESPONSE TO PETITION FOR *INTER PARTES* REVIEW

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EXHIBIT LIST

Exhibit No.	Exhibit Title
1001	Reed (U.S. Pat. No. 10,154,092)
1006	Heil (U.S. Pat. No. 6,173,374)
1007	Nakayama (U.S. Pat. No. 5,920,893)
1008	Gulick (U.S. Pat. No. 5,692,211)
1009	Berman (U.S. Pat. No. 6,118,776)
2001	Declaration of Dr. Hassan Zeino, Ph.D.

I. INTRODUCTION

The Board should decline to institute IPR proceedings as to any Challenged claims 1-24 of U.S. Patent No. 10,154,092 (“the ’092 Patent”) because Petitioner has not demonstrated that any claim is likely to be found unpatentable.

Petitioner has not adequately explained how a person of ordinary skill in the art (“POSITA”) would approach the problems in the art solved by the ’092 Patent. Additionally, Petitioner has failed to demonstrate that the cited references anticipate or render obvious every element of any of the Challenged Claims. More specifically, the Petitioner has failed to cite a reference that teaches or suggest (and the primary reference teaches away from the element of “a first interface configured to receive input/output (I/O) traffic from a first host device via a dedicated I/O channel, the I/O traffic comprising a read command” and “a processor coupled to [a] cache memory, the processor coupled to [a] storage device via a communication path that is distinct from the dedicated I/O channel, the processor configured to access the cache memory during processing of the I/O traffic.”

Accordingly, Patent Owner requests that the Board deny the petition for *inter partes* review.

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