

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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CISCO SYSTEMS, INC., MICROSOFT CORPORATION,  
AMAZON.COM, INC., AMAZON WEB SERVICES, INC., AND  
AMAZON.COM SERVICES LLC,  
Petitioner,

v.

LS CLOUD STORAGE TECHNOLOGIES LLC,  
Patent Owner

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IPR2023-00733  
Patent 10,154,092

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

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## EXHIBIT LIST

<b>Exhibit No.</b>	<b>Exhibit Title</b>
1001	Gertner (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)

## 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 suggests (and indeed 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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