IPR2023-00975 U.S. Pat. No. 6,874,014

#### UNITED STATES PATENT AND TRADEMARK OFFICE

#### **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

APPLE INC.,

Petitioner

v.

#### SONRAI MEMORY LIMITED,

Patent Owner

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,874,014

DOCKET

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#### I. INTRODUCTION

Apple Inc. ("Apple" or "Petitioner") petitions for *inter partes* review of U.S. Patent No. 6,874,014 ("'014 patent") (EX1001). The '014 patent describes a chip architecture having multiple processors on a single die that utilizes multiple operating systems. As shown below, the system described in the '014 patent was known in the prior art.

#### **II. MANDATORY NOTICES**

#### A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that Apple is the real party-in-interest, and further certifies that no other party exercised control or could exercise control over the filing of this petition or Apple's participation in any proceeding instituted on this petition.

#### **B.** Related Matters

According to assignment records at the United States Patent and Trademark Office, the '014 patent is currently owned by Sonrai Memory Limited ("Patent Owner" or "PO").

The '014 patent is asserted in the matter *Sonrai Memory Ltd.* v. *Apple Inc.*, 6:22-cv-00787 (WDTX).

The '014 patent was the subject of a previously filed *inter partes review* – IPR 2021-01454 (hereinafter "'1454 IPR"). In the '1454 IPR, prior Petitioner requested

institution of inter partes review of the '014 patent under the same grounds proposed in the present Petition. On March 4, 2022, the Board issued their decision instituting *inter partes* review of all of the challenged claims of the '014 patent on all grounds asserted in the former Petition. On October 12, 2022, the Board granted the joint Motion to Terminate the '1454 IPR proceeding following a settlement agreement between the parties. Although the Board had instituted *inter partes* review of the challenged claims, the Board did not decide the merits of the proceedings.

The present petition for *inter partes* review is also related to IPR2023-00819 that is substantially similar to the '1454 IPR. The '819 IPR was filed by Petitioner and presents substantially the same grounds as the '1454 IPR. The present petition presents different grounds from the '819 and '1454 IPRs.

#### C. Counsel

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Backup Counsel: James Heintz (Reg. No. 41,828)

#### D. Service Information, Email, Hand Delivery, and Postal

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