EXHIBIT 1



IPR2016-01060 U.S. Patent No. 8,933,945 B2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC., Petitioner,

V.

ADVANCED SILICON TECHNOLOGIES LLC
Patent Owner

Case IPR2016-01060 U.S. Patent No. 8,933,945 B2

PATENT OWNER'S PRELIMINARY RESPONSE PURSUANT TO 37 C.F.R. § 42.107(a)



IPR2016-01060 U.S. Patent No. 8,933,945 B2

TABLE OF CONTENTS

		PA	GE		
I.	Intro	oduction & Summary of Arguments	1		
II.	The	'945 Patent Discloses Improved Graphics Pipelines	3		
III.	Unified's Petition				
	A.	The Challenged Claims	8		
	В.	The Asserted References	10		
		1. Narayanaswami	10		
		2. Perego.	13		
		3. Seiler	15		
IV.	The Correct Claim Construction of Material Disputed Terms				
	A.	The Controlling Claim Construction Standard	17		
	В.	The Only Material Claim Construction Issue Facing the Board Is The Correct Construction of "memory controller"	19		
		1. The correct construction of "memory controller"	19		
		2. Unified provides no construction for "memory controller" and no support for its application of "memory controller" to Seiler	20		
		a. Unified neither alleges nor proves that its implicit construction is the ordinary meaning of the claimed "memory controller"	21		
		b. Unified neither alleges nor proves that its implicit construction is some purported special definition of the claimed "memory controller"			
	C.	The Remaining Claim Construction Dispute Is Not Material and Should Not Be Decided By the Board	25		
V.	All Challenged Claims: Seiler Cannot Cure The Admitted Deficiencies Of Perego And Narayanaswami				
	A.	Seiler Does Not Disclose The Claimed Memory Controller	26		
	В.	Unified Has Failed To Identify Evidence Sufficient To Meet Its Burden Of Proving That It Would Have Been Obvious To Combine Seiler With Either Perego Or Narayanaswami	28		



Case 6:22-cv-00466-ADA-DTG Document 49-1 Filed 11/28/22 Page 4 of 55

IPR2016-01060 U.S. Patent No. 8,933,945 B2

	1.	Ground I: Unified Has Not Shown That It Would Have Been Obvious To Combine Seiler With Perego	.29
	2.	Ground II: Unified Has Not Shown That It Would Have Been Obvious To Combine Seiler With Narayanaswami	.31
		a. Unified identifies no explanation for how a person of ordinary skill would have combined Seiler and Narayanaswami	.33
		b. Unified fails to establish a reasonable likelihood of provious why a person of ordinary skill would have combined Narayanaswami and Seiler	ing .35
VI.	•	ged Claims: Unified Has Failed To Meet Its Burden Of A Pipeline "operative to process data in a dedicated tile"	.37
	1.	Unified Has Not Shown That Narayanswami Discloses A Pipeline "operative to process data in a dedicated tile"	.38
	2.	Unified Has Not Shown That Perego Discloses A Pipeline "operative to process data in a dedicated tile"	.42
VII.		Claims 2 and 3: Unified Has Failed To Meet Its Burden Of "a two dimensional partitioning of memory"	.44
VIII	Conclusion		46



IPR2016-01060 U.S. Patent No. 8,933,945 B2

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	Page(s)
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