### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent of Robert C. Chang et al.:

U.S. Patent No. 6,831,865

Issued: December 14, 2004

Title: Maintaining Erase Counts in

Non-Volatile Storage Systems

Petition for Inter Partes Review

Attorney Docket No.: 337722-000080.865

Customer No.: 26379

Petitioner: Apple Inc.

Real Party-in-Interest: Apple Inc.

### PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,831,865

Mail Stop Patent Board

Patent Trial and Appeal Board

P.O. Box 1450

Alexandria, VA 22313-1450

### Dear Sir:

Pursuant to the provisions of 35 U.S.C. §§ 311-319, Apple Inc. (hereinafter "Petitioner") hereby petitions the Patent Trial and Appeal Board to institute an *inter partes* review of claims 1-5, 8, 18, and 24-29 of United States Patent No. 6,831,865 (Ex. 1001).



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