

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUALCOMM INC. AND QUALCOMM TECHNOLOGIES, INC.,
Petitioners

v.

APPLE INC.,
Patent Owner

Case No. IPR2019-00322
Patent No. 8,443,216

PATENT OWNER'S PRELIMINARY RESPONSE

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LIST OF EXHIBITS

Apple-2001	[RESERVED]
Apple-2002	Petition (IPR2019-00321)

I. INTRODUCTION

The Board should deny institution because (1) Ground 1 fails to show that Mandelblat discloses an association of performance states between first and second performance domains in a power management unit as recited in claims 1 and 8; (2) Ground 2 presents inconsistent mappings and contradictory obviousness theories that mask substantive deficiencies in the Mandelblat-Kurts combination; (3) the petition fails to show in Ground 2 that Mandelblat and Kurts teach the requisite transition in performance states of a second performance domain as recited in the claims; (4) the petition fails to show in Ground 3 that Kurts and Kang teach the requisite transition in performance states of a second performance domain; and (5) the petition fails to show in Ground 3 that Kurts and Kang teach an association of performance states between first and second performance domains in a power management unit. Thus, each ground presented in the petition suffers fatal deficiencies.

These multiple procedural and substantive deficiencies prove that Petitioner has not demonstrated a reasonable likelihood of prevailing with respect to its challenges against at least one claim of the '216 patent. Institution should be denied.

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