

**REMARKS**

Claims 1-18, 20 and 21 are pending in this application. By this Amendment, claim 1 has been amended. Claims 1 and 10 are independent. Reconsideration of the application is respectfully requested.

Entry of the amendments is proper under 37 CFR §1.116 because the amendments: (a) place the application in condition for allowance for the reasons discussed herein; (b) do not raise any new issue requiring further search and/or consideration as the amendments merely make a change to improve grammar, without changing the substance; and (c) place the application in better form for appeal, should an appeal be necessary. Entry of the amendments is thus respectfully requested.

**I. Amendment**

Claim 1 has been amended for form. Thus, no new matter is added.

**II. Interview**

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Colan in the October 10, 2009 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

**III. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1-18, 20 and 21 under 35 U.S.C. §102(b) over U.S. Patent Publication No. 2004/0130552 to Duluk et al. (Duluk). This rejection is respectfully traversed.

Independent claims 1 and 10 recite, *inter alia*, "the securable memory has a higher access speed than the external storage apparatus." The applied reference fails to teach or suggest the recited features of independent claims 1 and 10.

As discussed during the interview, Duluk discloses a computer 101 that includes fast primary memory 106a, cache memory 106b and slower secondary memory 106c for mass

storage. However, Duluk discloses a computer structure for efficiently managing finite memory resources such that a previous stage of a graphics pipeline is given an indication that certain image data will not fit into a memory without overflowing the memory's storage capacity. Thus, Duluk does not utilize the slower secondary memory 106c when the certain image data will not fit into memory without overflowing the memory's storage capacity. See paragraphs [0815] and [0817] of Duluk.

Furthermore, as discussed during the interview, Duluk only discloses the temporarily stopping of sending image data to a write control due to a buffer overflow condition. This image data is not sent to slower memory. See paragraphs [0911], [0924] and [0927]-[0931]. Accordingly, Duluk fails to teach or suggest that the securable memory has a higher access speed than the external storage apparatus. Accordingly, the applied references fail to teach or suggest the recited features of independent claims 1 and 10.

The dependent claims are patentable at least due to their dependence on allowable independent claims 1 and 10 and for the additional features they recite.

For example, regarding claims 6 and 15, as discussed during the interview, Duluk merely discloses MEX, SRT and MIJ blocks that could share the same memory interface. See paragraph [0715] of Duluk. Accordingly, Duluk fails to teach or suggest that when release of the memory (by a first buffer module) is detected, the storage resource management unit writes data written in the storage region of the external storage apparatus, and allocates the memory in which the data is written in place of the storage region of the external storage apparatus in which the data had been written, to the second buffer module. Accordingly, Duluk fails to teach or suggest the recited features of dependent claims 6 and 15.

Accordingly, withdrawal of the rejection of the claims is respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-18, 20 and 21 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Date: November 17, 2009

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