REMARKS

Claims 1-5, 8, 20-22, 24, 27, 30 and 35-37 are pending in the present application. By this reply, new claims 35-37 have been added. Claims 6-7, 9-19, 23, 25-26, 28-29, and 31-34 have been cancelled without prejudice or disclaimer of the subject matter contained therein. Claims 1, 20 and 21 remain independent.

The claims have been amended and new claims have been added to further clarify the distinguishing features of the invention and to improve form according to U.S. patent practice. These claims are fully supported by the original disclosure, e.g., Figs. 10, 11B, 8B, 7 and 12; and the corresponding description in the specification including paragraphs [0057], [0059], [0046], etc. Thus no new matter is added.

35 U.S.C. § 103 Rejection

Claims 1-5, 8 and 20-31 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Takano et al. in view of Ito et al. This rejection, insofar as it pertains to the presently pending claims, is respectfully traversed.

Independent claim 1 recites writing replacement-recording data to a replacement area in response to a request that a specified area be overwritten. Independent claim 1 further recites, inter alia:

the management information includes first and second entries,
the first entry includes start address information of the specified area requested to be overwritten, and start address information of the replacement area corresponding to the specified area,
the second entry includes end address information of the specified area requested to be overwritten, and end address information of the replacement area corresponding to the specified area,
the first and second entries are consecutive entries, and
each of the first and second entries further includes status information for indicating whether the corresponding entry is either a leading entry or a following entry following the leading entry.
Other independent claims 20 and 21 recite similar features. Each of these features is neither taught nor suggested by Takano or Ito, singly taken or in combination thereof.

More specifically, as correctly acknowledged by the Examiner, Takano does not teach or suggest writing replacement-recording data to a replacement area in response to a request that the specified area be overwritten, as in Applicants’ claimed invention. Since Takano does not teach any replacement-recording operation, Takano clearly does not (and cannot) teach or need recording management information associated with such replacement-recording operation. Thus, Takano nowhere discloses first and second entries that are \textit{consecutive} entries, where \textit{the first entry includes start address} information of the \textit{specified area} requested to be overwritten, and \textit{start address} information of the \textit{replacement area corresponding to the specified area}; and \textit{the second entry includes end address} information of the \textit{specified area} requested to be overwritten, and \textit{end address} information of the \textit{replacement area corresponding to the specified area},” as recited in independent claims 1, 20 and 21. Further, clearly in Takano there is no mention of \textit{“each of the first and second entries further includes status information for indicating whether the corresponding entry is either a leading entry or a following entry following the leading entry”} as recited in independent claims 1, 20 and 21.

The Examiner maintains that Takano’s storing of a start block location and a last block location of each file A and B in the management table 20 (see column 10, lines 11-18 of Takano) can be equated to Applicants’ first and second consecutive entries, the first entry having the start address information and start address information of two corresponding areas (overwritten area and the corresponding replacement area), the second entry having the end address information and end address information of the same two corresponding areas (overwritten area and the corresponding replacement area). However, all Takano teaches is that the start and end block locations of each file A and B are stored. But there is no teaching that Takano’s files A and B are respectively the overwritten area and the corresponding replacement area for writing replacement-recording data. Further, there is no teaching that the start and end block locations of Takano’s files A and B are stored in the manner claimed in Applicants’ invention (i.e., the first entry having the two start addresses of the specified area and the corresponding replacement
area, the second entry having the two end addresses of the specified area and the corresponding replacement area, where these entries are consecutive entries). Applicants' specific structures of the first and second entries are unique and advantages since a controller can access each entry at a time to effectively obtain both the corresponding addresses (start and start addresses; or end and end addresses) for the overwritten area and the corresponding replacement area at a time.

Moreover, Ito does not overcome the above deficiencies of Takano. Although Ito is directed to defect management, Ito stores defect management information in a conventional manner, and thus does not and cannot teach or suggest the specific first and second entry structures recited in independent claims 1, 20 and 21.

Therefore, the combination of references as applied by the Examiner fails to teach or suggest the inventions as set forth in independent claims 1, 20 and 21 and their dependent claims (due to the dependency), and the rejection is improper and should be withdrawn.

**New Claims**

New claims 35-37 further define the invention as set forth in independent claims 1, 20 and 21 and are allowable at least for the same reasons that their independent claims are allowable as discussed above. These claims further emphasize that each entry is a single unit of information according to the embodied invention. Accordingly, indication of allowance of these dependent claims is respectfully requested.
CONCLUSION

For the foregoing reasons and in view of the above clarifying amendments, the Examiner is respectfully requested to reconsider and withdraw all of the objections and rejections of record, and an early issuance of a Notice of Allowance is respectfully requested.

Should there be any matters which need to be resolved in the present application, the Examiner is respectfully requested to contact Esther H. Chong (Registration No. 40,953) at the telephone number of the undersigned below.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.14; particularly, extension of time fees.

Dated: August 1, 2008

Respectfully submitted,

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