

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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REGIONS FINANCIAL CORPORATION, ADVANCE AMERICA,  
CASH ADVANCE CENTERS, INC., and CNU ONLINE HOLDINGS, LLC  
F/K/A CASH AMERICA NET HOLDINGS, LLC  
Petitioners

v.

RETIREMENT CAPITAL ACCESS MANAGEMENT COMPANY LLC  
Patent Owner

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Case CBM2014-00012  
Patent No. 6,625,582

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**PETITIONERS' REPLY**

**TABLE OF CONTENTS**

**Page**

Table of Authorities ..... ii

I. Statement of Relief Requested..... 1

II. Preliminary Statement..... 1

III. Statement Identifying Material Facts in Dispute ..... 3

IV. The Claim Limitations Identified by RCAMC Do Not Limit the Scope of the Claims to Less than the Abstract Idea and Thus are Not Directed To Patentable Subject Matter Under 35 U.S.C. § 101..... 3

    A. Despite RCAMC’s Assertions, the Claims are Not Eligible Subject Matter Under Supreme Court Precedent and Recent Guidelines..... 4

    B. The “Without Encumbering ....” Limitation Does Not Meaningfully Limit the Claims..... 6

    C. The “Computerized Method” or “Computer” Is Not an Integral Component Of and Does Not Meaningfully Limit The Claims ..... 8

    D. Other Limitations and Purported Admissions..... 12

V. RCAMC’s Remaining Arguments Are Irrelevant..... 14

    A. Expert Testimony Is Not Required To Show Claims Are Ineligible ..... 14

    B. The PTAB Has Authority to Grant CBM Review On Section 101. .... 15

VI. Conclusion ..... 15

**TABLE OF AUTHORITIES**

	<b>Page(s)</b>
<b>CASES</b>	
<i>Alice Corp. Pty. Ltd. v. CLS Bank Int’l et al.</i> , 134 S.Ct. 2347 (2014).....	passim
<i>Bancorp Servs., L.L.C. v. Sun Life Assur. Co. of Can.</i> , 687 F.3d 1266 (Fed. Cir. 2012) .....	10, 11, 12, 13
<i>Comark Commc'ns, Inc. v. Harris Corp.</i> , 156 F.3d 1182 (Fed. Cir. 1998) .....	9
<i>CyberSource Corp. v. Retail Decisions, Inc.</i> , 654 F.3d 1366 (Fed. Cir. 2011) .....	9, 11
<i>Dealertrack, Inc. v. Huber</i> , 674 F.3d 1315 (Fed. Cir. 2012) .....	10
<i>Digitech Image Tech., LLC v. Electronics for Imaging, Inc.</i> , 2014 WL 3377201 (Fed. Cir. July 11, 2014) .....	3
<i>Lee v. Mike's Novelties, Inc.</i> , 2013-1049, 2013 WL 6097232 (Fed. Cir. Nov. 21, 2013).....	14, 15
<i>Mayo Collaborative Servs. v. Prometheus Labs., Inc.</i> , 132 S. Ct. 1289 (2012) .....	5, 12
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005) .....	9
<i>SiRF Tech., Inc. v. ITC</i> , 601 F.3d 1319 (Fed. Cir. 2010) .....	9
<i>SmithKline Beecham Corp. v. Apotex Corp.</i> , 439 F.3d 1312 (Fed. Cir. 2006) .....	4
<i>Ultramercial, Inc. v. Hulu, LLC</i> , 722 F.3d 1335 (Fed. Cir. 2013) .....	7, 14

**STATUTES**

35 U.S.C. § 101..... passim

**PTAB DECISIONS**

*Apple, Inc. v. Sightsound Technologies, LLC* (CBM2013-00019)..... 11

*Fidelity Nat'l Information Svcs, Inc. v. Cashedge, Inc.*, (CBM2013-00028).....7

*SAP America, Inc. v. Versata Development Group, Inc.*, (CBM2012-00001)..... 15

**PATENTS**

U.S. Patent No. 6,625,582..... passim

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## I. STATEMENT OF RELIEF REQUESTED

Petitioners Regions Financial Corporation (“Regions”), Advance America, Cash Advance Centers, Inc. (“AA”), and CNU Online Holdings (“CNU”) (collectively, “Petitioners”) respectfully request cancellation of asserted claims 1, 13, 14, 18, 30, and 31 of U.S. Patent No. 6,625,582 (“the ‘582 patent,” Ex. 1003) under 35 U.S.C. § 101 for the reasons set forth herein and in their Petition for CBM Review.

## II. PRELIMINARY STATEMENT

Petitioners set forth sufficient evidence for the PTAB to find, based on the claims, specification, and file history, that the asserted claims of the ‘582 patent are not patentable under § 101. Petitioners demonstrated that the claims-at-issue do not include *any* meaningful, concrete limitations that would limit the claims to a specific application of the abstract idea of advancing funds based on the present value of future retirement payments. Rather, the claims merely state that the funds are advanced without violating U.S. law. The claimed inventions can be accomplished without a computer, and even if one were needed, do not require specific computer hardware or software. For these reasons, the Board should find the asserted claims are not patentable under § 101.

RCAMC’s arguments contradict the proper analysis set forth under the Supreme Court’s recent decision in *Alice Corp. Pty. Ltd. v. CLS Bank Int’l et al.*, 134 S.Ct. 2347 (2014) and the “Preliminary Examination Instructions in view of the Supreme Court Decision in *Alice Corporation Pty. Ltd. v. CLS Bank International, et al.*,”

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