# 

STARBUCKS CORP.
Petitioner

V.

AMERANTH, INC.
Patent Owner

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Case CBM2015-00099 Patent No. 6,871,325

**PATENT OWNER'S RESPONSE** 

Submitted Electronically via the Patent Review Processing System



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Neither Challenge Provides A Teaching Or Suggestion Of "A Central Datab	
Containing Hospitality Applications And Data"	



Da On	The Asserted References Do Not Disclose "Wherein Applications And Ita [which] Are Synchronized Between The Central Database, At Least Die Wireless Handheld Computing Device, At Least One Web Server And Least One Web Page"	
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	Claim As A Whole	
	Objective Evidence Of Non-Obviousness	
1.	There is a very strong nexus between the evidence of "secondary nsiderations" and the challenged claims.	
2.	The Ameranth patents in this family, including the challenged claims, have en successfully and extensively licensed.	63
3.	Ameranth's products enjoyed substantial, widespread commercial success	66
4.	Ameranth's 21 <sup>st</sup> Century Restaurant received numerous technology awards a lustry acclaim after its introduction.	
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