

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLAID TECHNOLOGIES INC.,
Petitioner

v.

YODLEE, INC. and YODLEE.COM, INC.,
Patent Owner

Case No. IPR2015-_____
Patent 6,199,077

PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,199,077

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Plaid Technologies Inc.
Exhibit 1012

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EXHIBIT LIST

Exhibit Number	Description
1001	U.S. Patent No. 6,199,077 ('077 Patent)
1002	Summons Returned as Executed , <i>Yodlee, Inc. v. Plaid Technologies, Inc.</i> , Case No. 1:14-cv-01445-LPS-CJB (D. Del. filed December 1, 2014)
1003	U.S. Patent No. 6,317,783 to Freishtat (the "'783 Patent" or "Freishtat")
1004	Declaration of Dr. Todd Mowry
1005	Redline Comparison of U.S. Patent Appl. No. 09/323,598 and Application No. 09/208,740
1006	File History of U.S. Patent No. 6,199,077
1007	U.S. Patent No. 6,278,449 ("Sugiarto")
1008	U.S. Patent No. 5,892,905 ("Brandt")
1009	Zhao, "Technical Note, WebEntree: A Web Service Aggregator," (1998) ("Zhao")
1010	Claim Construction Briefing, <i>Yodlee, Inc. v. Plaid Technologies, Inc.</i> , Case No. 1:14-cv-01445-LPS-CJB (D. Del. filed December 1, 2014)
1011	Claim Construction Order, <i>Yodlee, Inc. v. CashEdge, Inc.</i> , No. C 05-01550 SI, slip op. (N.D. Cal., July 7, 2006)
1012	Provisional Appl. No. 60/105,917 ("the '917 Application")
1013	Redline Comparison of Provisional Appl. No. 60/105,917 and
1014	Screenshot of ACM Digital Library Page
1015	U.S. Patent No. 6,029,175 ("Chow")
1016	U.S. Patent No. 6,401,118 ("Thomas")
1017	U.S. Patent No. 6,006,333 ("Nielsen")
1018	Screenshots of ESPN Pages
1019	U.S. Patent No. 6,041,362 ("Mears")
1020	U.S. Patent 6,243,816 ("Fang")

I. INTRODUCTION AND RELIEF REQUESTED

Plaid Technologies, Inc. (“Petitioner”) hereby petitions for institution of *inter partes* review of U.S. Patent No. 6,199,077 (the “’077 Patent”) (Ex. 1001). The ’077 Patent issued on March 6, 2001. Yodlee, Inc. contends that it is the assignee of all right, title and interest in the ’077 Patent, but USPTO assignment records show that the assignee is Yodlee.com, Inc. Thus, both parties have been named and are referred to collectively as Patent Owner. Petitioner respectfully requests cancellation of claims 1–12 of the ’077 Patent based on the grounds of unpatentability herein. The prior art and other evidence offered with this Petition establishes that all elements in the challenged claims of the ’077 Patent were well known as of the earliest alleged priority date, and that the claimed methods and systems recited in the ’077 Patent are obvious.

II. GROUNDS FOR STANDING

Petitioner certifies that the ’077 Patent is available for review under 35 U.S.C. § 311(c) and that Petitioner is not estopped from requesting an *inter partes* review challenging claims 1–12 on the grounds identified herein.

III. MANDATORY NOTICES

Real Party in Interest: Petitioner Plaid Technologies, Inc.

Related Matters: Petitioner has been charged with infringement of the ’077 Patent in the parallel litigation styled *Yodlee, Inc. v. Plaid Technologies, Inc.*, Case No. 1:14-cv-01445-LPS-CJB (D. Del.), filed December 1, 2014 (“Co-Pending

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