

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLAID TECHNOLOGIES INC.
Petitioner

v.

YODLEE, INC.
Patent Owner

Case IPR2016-00273
Patent 6,317,783

PATENT OWNER'S PRELIMINARY RESPONSE

Plaid Technologies Inc.

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 A. Claim 1.....6

 1. [1.1]: A method for delivering non-public *personal information* relating to an end user via a wide-area computer network to an end user.....9

 2. [1.2]: from at least one of a plurality of information providers securely storing the *personal information*..... 12

 3. [1.5]: (b) for a selected end user, the processor retrieving *personal information* for the selected end user from the connected at least one information provider 13

 4. [1.7]: the information accessible to the processor using the protocol also being accessible by the end user via the network independently of the system for delivering *personal information*; and 13

 5. [1.8]: (c) the processor storing the retrieved *personal information* in a personal information store for access by the selected end user. 14

 B. Claims 6, 7, 10-12, and 14-17 14

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Cases

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Statutes

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EXHIBIT LIST

Exhibit No.	Description
2001	ESPN Insider: Benefits, WayBackMachine June 22, 2001

Pursuant to 37 C.F.R. § 42.107(a), the Patent Owner, Yodlee, Inc. (“Yodlee” or “Patent Owner”), hereby submits the following Preliminary Response in opposition to the Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 6,317,783 (“the ’783 Patent”) numbered IPR2016-00273, filed by Plaid Technologies, Inc. (“Plaid” or “Petitioner”).

I. INTRODUCTION

The ’783 Patent is entitled “Apparatus and Methods For Automated Aggregation and Delivery of and Transactions Involving Electronic Personal Information or Data.” As the specification makes clear, the ’783 Patent is directed to overcoming specific problems that plagued early personalization technologies. Ex. 1001 at 4:22-51. Every claim (and in fact, almost every limitation of many of the claims) requires technology that operates on non-public personal information – specialized technology that is designed to enable the storage, retrieval, and use of non-public personal information. *See, e.g.*, independent claim 1. As described below, the term “personal information” is even specifically described within the body of the ’783 Patent itself and the file history.

While Petitioner acknowledges the focus on non-public personal information in both the specification and the file history of the ’783 Patent, the Petition lacks any detail regarding how the cited grounds would disclose or suggest it. As described below, Petitioner focuses solely on the prior art disclosure of public information and never shows the prior art disclosure of the

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