

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 CBM2016-00045
Patent 6,317,783

PATENT OWNER'S PRELIMINARY RESPONSE

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EXHIBIT LIST

Exhibit No.	Description
2001	Report and Recommendation, <i>Yodlee, Inc. v. Plaid Techs. Inc.</i> , No. 1:14-cv-01445-LPS (D. Del.), Dkt. 185.

Pursuant to 37 C.F.R. § 42.207(a), Yodlee, Inc. (“Yodlee” or “Patent Owner”), hereby submits the following Preliminary Response in opposition to the Petition for Covered Business Method (“CBM”) Review of U.S. Patent No. 6,317,783 (“the ’783 Patent”) numbered CBM2016-00045, filed by Plaid Technologies, Inc. (“Plaid” or “Petitioner”).

I. INTRODUCTION

The ’783 Patent describes and claims a technical solution to a number of problems that are specifically identified in the Patent itself. In particular, the Patent describes methods and systems for accessing a number of different websites storing non-public personal information, and the use of specific protocols for accessing and retrieving that information from those websites. In fact, this invention solves multiple technical problems, including the difficulty of retrieving personal information from different websites having different interfaces and protocols for accessing that information and the problem that websites storing personal information may change over time, including changing how that information is accessed.

Despite the demonstrably technical nature of the claimed invention, which is potentially applicable to a number of different fields, the Petition incorrectly asserts that the ’783 Patent is eligible for covered business method review. An analysis of the claims as a whole makes clear that, because of the disclosure of the technical problems being addressed by the ’783 Patent as well as the disclosed and claimed technical solutions, the Patent recites a

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