UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNITED SERVICES AUTOMOBILE ASSOCIATION, Petitioner

v.

NADER ASGHARI-KAMRANI and KAMRAN ASGHARI-KAMRANI, Patent Owners

U.S. PATENT NO. 8,266,432 Case IPR2015-01842

PATENT OWNER PRELIMINARY RESPONSE

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Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450



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ce: wi	Neuman fails to disclose the claimed feature "receiving electronically by the ntral-entity a request for authenticating the user from a computer associated that the external-entity based on a user-specific information and the dynamic de"
	Neuman fails to disclose the claimed feature, "generating by the central-entity a dynamic codeauthenticating by the central-entity the user"51



3. Neuman fails to disclose the claimed feature, "authenticating by the central- entity the user and providing a result of the authenticating to the external-entity during the transaction if the digital identity is valid"
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LIST OF EXHIBITS

Exhibit No.	Description
Ex. 2001	Affidavit by Abolfazl Hosseinzadeh dated on Feb. 28, 2012 and
	submitted to the USPTO on March 1, 2012 during the prosecution
	of U.S. patent No. 8,266,432
Ex. 2002	Affidavit by Kamran Asghari-Kamrani dated on Feb. 27, 2012
	and submitted to the USPTO on March 1, 2012 during the
	prosecution of U.S. patent No. 8,266,432
Ex. 2003	Affidavit by Nader Asghari-Kamrani dated on Feb. 27, 2012 and
	submitted to the USPTO on March 1, 2012 during the prosecution
	of U.S. patent No. 8,266,432
Ex. 2004	Affidavit by James Hewitt dated on Feb. 28, 2012 and submitted
	to the USPTO on March 1, 2012 during the prosecution of U.S.
	patent No. 8,266,432



TABLE OF AUTHORITIES

Cases Gubelmann v. Gang, Haemonetics Corp. v. Baxter Healthcare Corp., In re Am. Acad. of Sci. Tech. Ctr., 367 F.3d 1359 (Fed. Cir. 2004)......9 *In re Eli Lilly & Co.*, In re Gordon, 733 F.2d 900 (Fed. Cir. 1984)......30 In re Grasselli, In re Oelrich, In re Piasecki. In re Ratti,



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