

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner,

v.

UNIVERSAL SECURE REGISTRY LLC
Patent Owner

Case CBM2018-00022
U.S. Patent No. 9,530,137

PATENT OWNER'S PRELIMINARY RESPONSE

TABLE OF CONTENTS

| | <u>Page</u> |
|--|--------------------|
| I. INTRODUCTION | 1 |
| II. OVERVIEW OF THE '137 PATENT | 4 |
| A. The '137 Patent Specification | 4 |
| B. The '137 Patent Claims | 9 |
| C. Prosecution History of the '137 Patent | 10 |
| III. LEVEL OF ORDINARY SKILL IN THE ART | 10 |
| IV. CLAIM CONSTRUCTION | 11 |
| V. THE '137 PATENT DOES NOT QUALIFY AS A "COVERED BUSINESS METHOD PATENT" | 12 |
| A. The claims are not directed to a "financial product or service" | 13 |
| 1. Dependent claims 8, 10, and 11 have been disclaimed and may not be considered in determining CBM eligibility | 15 |
| 2. The claimed systems are not limited to financial transactions | 16 |
| B. The claims are directed to a "technological invention" | 17 |
| 1. The claimed invention recites a novel and inventive technological feature that provides a technical solution to a technical problem | 18 |
| 2. Petitioner fails to show the '137 patent does not claim a "technological invention" | 21 |
| VI. THE CHALLENGED CLAIMS OF THE '137 PATENT ARE DIRECTED TO PATENT-ELIGIBLE SUBJECT MATTER | 25 |
| A. The claims are not directed to an abstract idea | 28 |
| B. The claims provide a technical innovation | 35 |
| VII. CONCLUSION | 38 |

TABLE OF AUTHORITIES

Page

CASES

| | |
|---|------------|
| <i>Alice Corp. Pty. Ltd. v. CLS Bank Int'l</i> , 134 S. Ct. 2347 (2014)..... | passim |
| <i>Bascom Glob. Internet Servs., Inc. v. AT&T Mobility, LLC</i> , 827 F.3d 1341 (Fed. Cir. 2016) | 36 |
| <i>Bilski v. Kappos</i> , 561 U.S. 593 (2010)..... | 26, 30, 36 |
| <i>Biscotti Inc. v. Microsoft Corp.</i> , 2016 WL 6611487 (E.D. Tex. Nov. 9, 2016)..... | 12 |
| <i>Bloomberg L.P. v. Quest Licensing Corporation</i> , CBM2014-00205 (PTAB Apr. 7, 2015)..... | 3, 23 |
| <i>Blue Calypso, LLC v. Groupon, Inc.</i> , 815 F.3d 1331 (Fed. Cir. 2016) | 2, 13, 14 |
| <i>Cuozzo Speed Techs., LLC v. Lee</i> , 136 S. Ct. 2131 (2016)..... | 11 |
| <i>Diamond v. Diehr</i> , 450 U.S. 175 (1981)..... | 35 |
| <i>Enfish, LLC v. Microsoft Corp.</i> , 822 F.3d 1327 (Fed. Cir. 2016) | passim |
| <i>Experian Mktg. Sol'ns, Inc. v. RPost Commc'ns Ltd.</i> , CBM2014-0010 (PTAB Apr. 22, 2014)..... | 23 |
| <i>Facebook, Inc. v. Skky, LLC</i> , Case CBM2016-00091 (PTAB Sept. 28, 2017)..... | 16 |
| <i>Finjan, Inc. v. Blue Coat Systems, Inc.</i> , 879 F.3d 1299 (Fed. Cir. 2018) | 21, 33, 34 |
| <i>Guinn v. Kopf</i> , 96 F.3d 1419 (Fed. Cir. 1996) | 15 |
| <i>Idexx Labs., Inc. v. Charles River Labs., Inc.</i> , 2016 WL 3647971 (D. Del. Jul. 1, 2016)..... | 30 |
| <i>In re Trans Texas Holdings Corp.</i> , 498 F.3d 1290 (Fed. Cir. 2007) | 12 |

| | |
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| <i>King Pharms., Inc. v. Eon Labs, Inc.</i> , 616 F.3d 1267 (Fed. Cir. 2010) | 35 |
| <i>Mayo Collaborative Services v. Prometheus Labs., Inc.</i> , 132 S. Ct. 1289 (2012)..... | 25 |
| <i>McRO, Inc. v. Bandai Namco Games Am. Inc.</i> , 837 F.3d 1299 (Fed. Cir. 2016) | 28, 30, 31 |
| <i>Plaid Tech. Inc., v. Yodlee, Inc.</i> , CBM2016-00070 (PTAB Oct. 6, 2016) | 13, 15 |
| <i>Research Corp. Techs., Inc. v. Microsoft Corp.</i> , 627 F.3d 859 (Fed. Cir. 2010) | 28 |
| <i>SAS Institute, Inc. v. Iancu</i> , 138 S. Ct. 1348 (2018)..... | 26 |
| <i>Secure Access, LLC v. PNC Bank Nat'l Ass'n</i> , 848 F.3d 1370 (Fed. Cir. 2017) | 1, 13, 14 |
| <i>Secured Mail Sols. v. Universal Wilde</i> , 873 F.3d 905 (Fed. Cir. 2017) | 32, 35 |
| <i>Shire Dev. LLC v. Amneal Pharms. LLC</i> , 2016 WL 4119940 (D.N.J. Aug. 2, 2016) | 12 |
| <i>Smart Meter Techs., Inc. v. Duke Energy Corp.</i> , 2017 WL 2954916 (D. Del. July 11, 2017)..... | 32 |
| <i>Smart Sys. Innovations, LLC v. Chi. Transit Auth.</i> , 873 F.3d 1364 (Fed. Cir. 2017) | 32, 33 |
| <i>Unwired Planet, LLC v. Google Inc.</i> , 841 F.3d 1376 (Fed. Cir. 2016) | 1, 13, 14 |
| <i>Vectra Fitness, Inc. v. TNWK Corp.</i> , 162 F.3d 1379 (Fed. Cir. 1998) | 15 |
| <i>Yahoo! Inc. v. Almondnet, Inc.</i> , CBM2017-00051 (PTAB Nov. 28, 2017) | 2, 13, 15 |

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| | |
|-------------------------|--------|
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| 35 U.S.C. § 253 | 15 |
| 35 U.S.C. § 324 | 3, 25 |
| 37 C.F.R. § 1.321 | 15 |

37 C.F.R. § 42.30011
37 C.F.R. § 42.301 passim
37 C.F.R. § 42.304 11, 12
AIA § 18..... passim

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157 Con. Rec. S5402 (daily ed. September 8, 2011) (statement of Sen Kyl)22

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