Filed on Behalf of MPHJ TECHNOLOGY INVESTMENTS, INC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RICOH AMERICAS CORPORATION AND XEROX CORPORATION,

Petitioners

V.

MPHJ TECHNOLOGY INVESTMENTS, LLC,

Patent Owner

Case IPR2013-00302 Patent 7,986,426

PATENT OWNER RESPONSE AND OPPOSITION TO PETITION PURSUANT TO 37 C.F.R. § 42.120



TABLE OF CONTENTS

I.	INT	RODUCTION	1
II.	TEC	CHNOLOGY BACKGROUND	1
III.	APPLICABLE LEGAL PRINCIPLES		
	A.	A Person of Ordinary Skill in the Art	3
	B.	The Petitioner's Burden of Proof	3
	C.	Novelty under 35 U.S.C. § 102	3
	D.	Using Inherency in an allegation of invalidity under 35 U.S.C. § 102	4
IV.	CLA	AIM CONSTRUCTION	5
	A.	"applications"	5
	B.	"third-party software application"	6
	C.	"module"	7
	D.	"integration of at least one of said electronic image, electronic graphics and electronic document" / "integration of one or more of said electronic image, electronic graphics and electronic document"	8
	E.	"dynamically combining"	8
V.	CLAIMS 1-11 ARE PATENTABLE OVER XNS9		
	A.	XNS does not anticipate the element of "implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations," as recited by claims 1-5	11
	В.	XNS does not anticipate the element of "at least one memory storing a plurality of interface protocols for interfacing and communicating," as recited by claims 1-5	16



C.	XNS does not anticipate the element of "integration of one or more of said electronic image, electronic graphics and electronic document into a destination application," as recited by claim 2 or "integrating electronic images into existing applications," as recited by claim 11
D.	XNS does not anticipate "adding at least one of electronic document, data and paper processing means via a single programming step," as recited by claim 4 or "adding at least one of electronic document and paper processing with a single programming step," as recited by claim 9
E.	XNS does not anticipate a software application that includes modules (<i>e.g.</i> , at least one input module, at least one output module, at least one process module, at least one client module, and at least one server module), as required by claim 5
F.	XNS does not anticipate a software application that includes at least one input module that manages "the electronic input from at least one third-party software application," as recited by claim 5 25
G.	XNS does not anticipate a software application that includes at least one output module that manages "the output of the data to the third-party software application," as recited by claim 5
Н.	XNS does not anticipate a software application that includes at least one process module that applies "processing functionality to the data comprising the at least one of paper and electronic input as it is being copied," as recited by claim 5
I.	XNS does not anticipate a software application that includes at least one server module "communicable with said at least one input, output, client, and process modules and external applications," as recited by claim 5
J.	XNS does not anticipate a server module that includes a "maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system," as recited by claim 6 or a "maintain list of available module means for



		recited by claim 10
	K.	XNS does not anticipate a "list being read on startup," as recited by claim 6
	L.	XNS does not anticipate a server module that includes a "maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file," as recited by claim 6 31
	M.	XNS does not anticipate a server module that includes "at least one server module application programmer interface," as recited by claim 7
VI.	CLA	IMS 1-11 ARE PATENTABLE OVER SALGADO33
	A.	Dr. Melen applies the wrong standard for anticipation in declaring that Salgado anticipates the '426 patent
	В.	Salgado does not anticipate "implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations," as recited by claims 1-5
	C.	Salgado does not anticipate the element of "integration of one or more of said electronic image, electronic graphics and electronic document into a destination application," as recited by claim 2 or "integrating electronic images into existing applications," as recited by claim 11
	D.	Salgado does not anticipate a software application that includes at least one input module that manages "the electronic input from at least one third-party software application," as recited by claim 5 39
	E.	Salgado does not anticipate a software application that includes at least one output module that manages "the output of the data to the third-party software application," as recited by claim 5
	F.	Salgado does not anticipate a software application that includes at least one process module that applies "processing functionality to



		the data comprising the at least one of paper and electronic input as it is being copied," as recited by claim 5	-0
	G.	Salgado does not anticipate a server module that includes a "maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system," as recited by claim 6 or a "maintain list of available module means for maintaining a list of input, output, and process modules," as recited by claim 10	-1
	Н.	Salgado does not anticipate the element of "a capacity for adding at least one of electronic document and paper processing with a single programming step," as recited by claim 9	12
VII.	CON	CLUSION4	13
CASI	5 0	TABLE OF AUTHORITIES	
		Co. USA, Inc. v. Monsanto Co., 948 F.2d 1264	5
<u>Com</u> Garn	in Int'	l., Inc. v. Cuozzo Speed Techs. LLC, IPR2012-00001 (P.T.A.B. 2013).	<u>.3</u> .3
In re	Aoyam	a, 656 F.3d 1293	.5
		h, 666 F.2d 578	
In re	Robert	tson, 169 F.3d 743	.5
		<i>N, Inc. v. Verisign, Inc.</i> , 545 F.3d 13594, 3	
		e Givens, Appeal 2009-003414	
<u>Trans</u>	clean	Corp. v. Bridgewood Servs., Inc., 290 F.3d 1364	.4
STAT	TUTES	;	
35 U.	0 0		2
	<u>S.C., §</u>	<u> 102</u>	<u>.3</u>
<u>35 U.</u>	S.C §	\$ 102 \$ 103	<u>.3</u> .3



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