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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

MOTION TO AMEND UNDER 37 C.F.R. § 42.121

I. SUMMARY OF MOTION TO AMEND

This motion to amend is submitted in accordance with 37 C.F.R. § 42.121. As required 37 C.F.R. § 42.121(a), Patent Owner has conferred with the Board during the initial conference call held on Dec. 17, 2013 with regard to filing this motion. (See [Paper 10] at p. 2). In the event that claim 1 of U.S. Patent No. 7,986,426 (the '426 patent) is found unpatentable, Patent Owner moves for claim 12, presented herein, to be substituted for claim 1. One claim, claim 12, is proposed as a substitute for original claim 1. Accordingly, this motion satisfies the general presumption that “only one substitute claim would be needed to replace each challenged claim.” 37 C.F.R. § 42.121(a)(3). Support for claim 12 from “the original disclosure of the patent” is provided below. See 37 C.F.R. § 42.121(b)(1)-(2).

II. CLAIM LISTING

The proposed substitute claim 12 is shown in markup form as compared to the original claim 1.

12. (Proposed substitute for claim 1) A computer data management system including at least one of an electronic image, graphics and document management system comprising (a) at least one scanner, digital copier or other multifunction peripheral, (b) an electronic filing system in communication with said scanner, digital copier or other multifunction peripheral for receiving and storing at

least one of said electronic image, electronic graphics and electronic document; and (c) at least one of printer service and facsimile service in communication with said electronic filing system via local area network or wide area network for outputting at least one of said electronic image, electronic graphics and electronic document as a printed hardcopy or printed fax, said computer data management system being capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable to at least one of locally and via Internet, comprising:

said at least one scanner, digital copier or other multifunction peripheral capable of rendering at least one of said electronic image, electronic graphics and electronic document from a paper hardcopy;

at least one memory storing a plurality of interface protocols for interfacing and communicating;

at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications,

wherein said software application for interfacing and communicating includes:

at least an input software module comprising a scanner software module;

a plurality of output software modules, each output software module managing writing at least one electronic image,

electronic graphics and electronic document to a respective third party software application;

a process software module applying imaging and non-imaging processes to said at least one electronic image, electronic graphics and electronic document as it is being copied;

a client software module presenting a user with said user interface, including target contact information relating to at least one of said plurality of external destinations and performing an operation when said user presses GO; and

a server software module which is in communication with said input, output, process and client modules, and also in communication via one or more of said plurality of interface protocols with a plurality of third party software applications, including commercially available third party software applications;

wherein after said user selects an external destination from said user interface and presses GO to invoke an automated GO process, the computer data management system includes integration of at least one of said electronic image, electronic graphics and electronic document using software so that said electronic image, electronic graphics and electronic document gets automatically and seamlessly replicated and transmitted to at least one of said plurality of external destinations;

wherein once said user presses GO, said input software module, said process software module, and at least one of said plurality of output software modules are sequentially initiated, resulting in at least one of said electronic image, electronic graphics and electronic document being automatically inserted into at least one third party software application, without the need of further manipulation of said

computer data management system or said third party software application by any person including said user;

wherein after at least one of said electronic image, electronic graphics and electronic document is automatically inserted into at least one third party software application, said software application for interfacing and communicating transmits update information, said update information including at least one result of the interaction of at least one of said electronic image, electronic graphics and electronic document with each of said input software module, said at least one of said plurality of output software modules, and said processing software module;

wherein the transmittal of at least one of said electronic image, electronic graphics and electronic document to at least one of said plurality of external destinations is via the public Internet;

wherein at least one of said plurality of external destinations is a commercially available third party software application;

wherein said third party software application is loaded onto a general purpose computer; and

wherein said third party application is an existing business application.

III. DISCUSSION OF PROPOSED CHANGES

Proposed independent claim 12 includes all the elements of original independent claim 1, as well as additional elements, as shown above. In particular, proposed claim 12 narrows the scope by adding the element of outputting to “an electronic filing system,” and “at least one of printer service and facsimile service”

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