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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

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

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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 XNS 9

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 12

B. 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

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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 17

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..... 22

E. XNS does not anticipate a software application that includes modules (*e.g.*, 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 23

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 26

H. 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 27

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..... 29

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

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maintaining a list of input, output, and process modules," as recited by claim 10 29

K. XNS does not anticipate a "list being read on startup," as recited by claim 6 31

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 32

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B. 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 35

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 37

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 40

F. Salgado does not anticipate a software application that includes at least one process module that applies "processing functionality to

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the data comprising the at least one of paper and electronic input as it is being copied," as recited by claim 5 40

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 41

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