

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

SONY CORPORATION OF AMERICA; AXIS COMMUNICATIONS AB; AXIS
COMMUNICATIONS INC.; and HEWLETT-PACKARD CO.
Petitioners

v.

NETWORK-1 SECURITY SOLUTIONS, INC.
Patent Owner

INTER PARTES REVIEW OF U.S. PATENT NO. 6,218,930
Case IPR: *To Be Assigned*

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,218,930
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1–42.80 & 42.100–42.123

Mail Stop: Patent Board
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Table of Contents

I.	INTRODUCTION	1
II.	MANDATORY NOTICES.....	3
A.	Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1).....	3
B.	Related Matters under 37 C.F.R. § 42.8(b)(2)	4
C.	Lead and Backup Counsel under 37 C.F.R. § 42.8(b)(3)	5
III.	REQUIREMENTS FOR <i>INTER PARTES</i> REVIEW	6
A.	Grounds for Standing Under 37 C.F.R. § 42.104(a).....	6
B.	Identification of Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested.....	7
1.	Construction of the Challenged Claims under 37 C.F.R § 42.104(b)(3).....	8
2.	How the Construed Claims are Unpatentable under 37 C.F.R. § 42.104(b)(4)	9
3.	Supporting Evidence under 37 C.F.R. § 42.104(b)(5).....	9
IV.	SUMMARY OF THE '930 PATENT AND TECHNOLOGY BACKGROUND	10
A.	The Alleged Invention of the '930 Patent.....	10
B.	Prosecution History of the '930 Patent	13
C.	Technology Background Relevant to the '930 Patent	13
V.	CLAIM-BY-CLAIM EXPLANATION OF GROUNDS FOR UNPATENTABILITY OF CLAIMS 6, 8, AND 9.....	15
A.	Ground 1: <i>Woodmas</i> in view of <i>Smith</i> and/or <i>Television Production</i> obviates claims 6, 8, and 9 of the '930 Patent under § 103(a).....	16
1.	Analysis of <i>Woodmas</i>	16
2.	Analysis of <i>Smith</i> and <i>Television Production</i>	17
3.	Motivation to Combine <i>Woodmas</i> with <i>Smith</i> and/or <i>Television Production</i>	19
B.	Ground 2: <i>Lehr</i> in view of <i>Woodmas</i> obviates claims 6, 8, and 9 of the '930 Patent under § 103(a).....	29

1.	Analysis of <i>Lehr</i>	29
2.	Analysis of <i>Woodmas</i>	31
3.	Motivation to Combine <i>Lehr</i> and <i>Woodmas</i>	33
C.	Ground 3: <i>Matsuno</i> anticipates claims 6, 8, and 9 under § 102(b).....	41
1.	Overview of <i>Matsuno</i>	41
2.	Analysis of <i>Matsuno</i>	42
D.	Ground 4: <i>Lamb</i> in view of <i>Matsuno</i> obviates claims 6, 8, and 9 under § 103(a).....	51
1.	Analysis of <i>Lamb</i>	51
2.	Analysis of <i>Matsuno</i>	53
3.	Motivation to Combine <i>Lamb</i> and <i>Matsuno</i>	54
VI.	CONCLUSION.....	60

List of Exhibits

No.	Exhibit
Ex. 1001	U.S. Patent No. 6,218,930, titled “Apparatus and Method for Remotely Powering Access Equipment Over a 10/100 Switched Ethernet Network” (“the ’930 Patent”).
Ex. 1002	Preliminary Response, <i>Avaya Inc. v. Network Sec. Solutions, Inc.</i> , IPR2013-00071, Paper 16 (Mar. 12, 2013).
Ex. 1003	“Remote Terminal Line Power for IEEE 802.9 Integrated Services Terminal Equipment,” IEEE 802.9f Draft Standard (IEEE 802.9f Editor, 1997).
Ex. 1004	“Magic Packet Technology,” AMD Publication # 20213 (Nov. 1995).
Ex. 1005	Declaration of Geoffrey O. Thompson (June 24, 2013).
Ex. 1006	Order—Staying Concurrent <i>Ex Parte</i> Reexamination—37 C.F.R. § 42.122(a), <i>Sony Corp. of Am. et al. v. Network Sec. Solutions, Inc.</i> , IPR2013-00092, Paper 10 (PTAB Dec. 26, 2012).
Ex. 1007	Office Action in <i>Ex Parte</i> Reexamination, 90/012,401 (Dec. 21, 2012).
Ex. 1008	Petitioner Sony Corporation of America’s Power of Attorney.
Ex. 1009	Petitioners Axis Communications AB and Axis Communications Inc.’s Power of Attorney.
Ex. 1010	Petitioner Hewlett-Packard Company’s Power of Attorney.
Ex. 1011	U.S. Patent No. 5,345,592 (issued Sept. 6, 1994) (“ <i>Woodmas</i> ”).
Ex. 1012	U.S. Patent No. 5,982,456 (issued Nov. 9, 1999) (“ <i>Smith</i> ”).
Ex. 1013	Ron Whittaker, <i>Television Production</i> (Lansing Hays et al. eds., 1993) (“ <i>Television Production</i> ”).
Ex. 1014	U.S. Patent No. 6,473,608 (issued October 29, 2002) (“ <i>Lehr</i> ”).
Ex. 1015	Japanese Unexamined Patent Application No. H10-13576 (published Jan. 16, 1998) (“ <i>Matsuno</i> ”).
Ex. 1016	Verified English translation of <i>Matsuno</i> .
Ex. 1017	U.S. Patent No. 6,449,348 (issued Sept. 10, 2002) (“ <i>Lamb</i> ”).
Ex. 1018	U.S. Provisional Patent App. No. 60/115,628 (filed Jan. 12, 1999) (“ <i>Lehr</i> Provisional”).
Ex. 1019	Decision: Institution of <i>Inter Partes</i> Review, <i>Avaya Inc. v. Network Sec. Solutions, Inc.</i> , IPR2013-00071, Paper 18 (PTAB May 24, 2013).
Ex. 1020	Decision: Institution of <i>Inter Partes</i> Review, <i>Sony Corp. of Am. v.</i>

	<i>Network Sec. Solutions, Inc.</i> , IPR2013-00092, Paper 21 (PTAB May 24, 2013).
Ex. 1021	Certification of English translation of <i>Matsuno</i> .
Ex. 1022	Notice of Allowability, No. 09/520,350 (Sept. 8, 2000).
Ex. 1023	U.S. Patent No. 447,918 (issued Mar. 10, 1891) (“ <i>Strowger</i> ”).
Ex. 1024	U.S. Patent No. 4,733,389 (issued Mar. 22, 1988) (“ <i>Puvogel</i> ”).

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.