BEFORE THE PATENT TRIAL AND APPEAL BOARD

PRINTING INDUSTRIES OF AMERICA

Petitioner

v.

CTP INNOVATIONS, LLC

Patent Owner

U.S. Patent No. 6,611,349 to Vogt et al.

IPR Trial No. TBD

PETITION FOR INTER PARTES REVIEW OF
CLAIMS 1-14 OF
U.S. PATENT NO. 6,611,349
UNDER 35 U.S.C. § 312 AND 37 C.F.R. §42.104

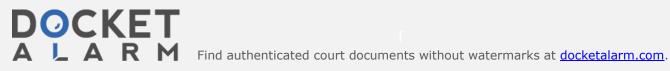
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TABLE OF AUTHORITIES

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