

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

PRINTING INDUSTRIES OF AMERICA  
Petitioner

v.

CTP INNOVATIONS, LLC  
Patent Owner

---

Case IPR2013-00474  
Patent 6,611,349

---

**RESPONSE TO NOTICE OF DEFECTIVE CERTIFICATE OF SERVICE  
AND CORRECTED CERTIFICATE OF SERVICE**

Filed on behalf of CTP Innovations, LLC

By: W. Edward Ramage (Lead Counsel)  
Reg. No. 50,810  
Samuel F. Miller (Back-up Counsel)  
*(pending pro hac vice admission)*  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
Baker Donelson Center  
211 Commerce Street, Suite 800  
Nashville, Tennessee 37201  
Tel: (615) 726-5771  
Fax: (615) 744-5771  
Email: eramage@bakerdonelson.com  
smiller@bakerdonelson.com

Patent Owner, CTP Innovations, LLC (“Patent Owner”), hereby files its Response to Petitioner’s Notice of Defective Certificate of Service (“Petitioner’s Notice”) and Corrected Certificate of Service to its Preliminary Response to Petition.

RESPONSE TO PETITIONER’S NOTICE

Petitioner’s Notice seeks to set a standard for Patent Owner that is higher than that for Petitioner. This is evidenced by Petitioner’s own failures to comply with this Board’s service requirements. Pursuant to 37 C.F.R. §42.105, Petitioner was to serve Patent Owner with the Petition via EXPRESS MAIL or by means at least as fast and reliable as EXPRESS MAIL. Yet in the certificate of service included in the Petition, Petitioner states that it served Patent Owner via “First Class, U.S. Mail” - not EXPRESS MAIL. Likewise, 37 C.F.R. §42.6 required Petitioner to serve Petitioner’s Notice via EXPRESS MAIL or by means at least as fast and reliable as EXPRESS MAIL. In the certificate of service included in Petitioner’s Notice, Petitioner states that it served Patent Owner via “First Class, U.S. Mail”. A copy of the envelope containing Petitioner’s Notice and showing First Class postage is attached hereto as Exhibit 1119. Patent Owner’s counsel received Petitioner’s Notice on December 6, 2013. Out of professional courtesy, Patent Owner has not complained to or filed a “Notice of Defective Certificate of Service” or “Notice of Defective Service” with the Board.

As indicated in its original certificate of service, Patent Owner electronically filed its Preliminary Response to Petition (the “Preliminary Response”) with the Board on Friday, October 4, 2013. Patent Owner has subsequently learned that due to an inadvertent clerical error, copies of the Preliminary Response may not have been sent to lead and back-up counsel for Petitioner until October 9, 2013. In Petitioner’s Notice, Petitioner asserts that its back-up counsel received a copy of the Preliminary Response via Priority U.S. Mail on October 11, 2013 and its lead counsel received a copy of the Preliminary Response via U.S. Mail on October 12, 2013. Accordingly, both Petitioner’s lead and back-up counsel received copies of the Preliminary Response well before the deadline for Patent Owner to file its Preliminary Response. Petitioner, therefore, has not been prejudiced in any way. Indeed, Petitioner has not even alleged any prejudice or harm in Petitioner’s Notice.

To the extent that the Board takes action against Patent Owner based on the Certificate of Service issue, the Board must also take the same or more serious action against Petitioner given Petitioner’s failures. Notwithstanding, Patent Owner respectfully asserts that action against either party is unnecessary at this time.

CORRECTED CERTIFICATE OF SERVICE

The undersigned hereby submits this Corrected Certificate of Service and certifies that the Preliminary Response, in its entirety, was electronically filed on October 4, 2013, and served no later than October 9, 2013, via Priority U.S. Mail upon the following:

John M. Adams  
PRICE & ADAMS, P.C.  
4135 Brownsville Road  
P.O. Box 98127  
Pittsburgh, Pennsylvania 15227-0127  
Tel: (412) 882-7170  
Fax: (412) 884-6650  
Email: paip.law@verizon.net

Lawrence G. Zurawsky  
ZURAWSKY & ASSOCIATES  
429 Forbes Avenue, Suite 600  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 281-7766  
Fax: (412) 281-7769  
Email: szurawsky@aol.com

Dated: December 6, 2013

Respectfully submitted,  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.

/W. Edward Ramage/  
W. Edward Ramage, Reg. No. 50,810  
Samuel F. Miller (*pending pro hac  
vice admission*)  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
Baker Donelson Center  
211 Commerce Street, Suite 800  
Nashville, Tennessee 37201  
Tel: (615) 726-5771  
Fax: (615) 744-5771  
Email: eramage@bakerdonelson.com  
smiller@bakerdonelson.com

*Counsel for Patent Owner CTP  
Innovations, LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on December 6, 2013, the foregoing Response to Petitioner's Notice of Defective Certificate of Service and Corrected Certificate of Service was served via EXPRESS MAIL upon the following:

John M. Adams  
PRICE & ADAMS, P.C.  
4135 Brownsville Road  
P.O. Box 98127  
Pittsburgh, Pennsylvania 15227-0127  
Tel: (412) 882-7170  
Fax: (412) 884-6650  
Email: paip.law@verizon.net

Lawrence G. Zurawsky  
ZURAWSKY & ASSOCIATES  
429 Forbes Avenue, Suite 600  
Pittsburgh, Pennsylvania 15219  
Tel: (412) 281-7766  
Fax: (412) 281-7769  
Email: szurawsky@aol.com

/W. Edward Ramage/  
W. Edward Ramage, Reg. No. 50,810