Filed on behalf of: Software Rights Archive, LLC Paper ____

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FACEBOOK, INC., LINKEDIN CORP., AND TWITTER, INC.,
Petitioners
v.

SOFTWARE RIGHTS ARCHIVE, LLC
Patent Owner

Case IPR2013-00480
Patent 5,832,494

PATENT OWNER'S RESPONSE

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I. INTRODUCTION

The claims of the '494 patent are directed to the analysis and searching of a computerized database of textual objects containing citations to other objects stored in the database. The '494 patent specification discloses computerized tools and methods for extracting keywords and direct relationships from the content of database objects and generating representations of direct and indirect relationships existing among the database objects.

The institution of the present trial on claims 1, 5, and 14-16 of the '494 patent[1] is entirely based on prior art describing experiments conducted by Petitioners' expert Dr. Fox. The experiments of Dr. Fox are not directed to the analysis of a computer database of objects, but rather are directed towards limited experimentation with relationships existing among printed documents. This prior art describes limited experiments to determine whether direct and indirect relationships existing among paper documents are useful for clustering and searching.

[1] Patent Owner is filing concurrently herewith, in accordance with the Board's Order (Paper 28 at 2) and pursuant to 35 U.S.C. § 316(d)(1)(A) and 37 C.F.R. § 42.121, a motion to amend the '494 patent by cancelling challenged claims 8, 10, 11, 35, and 40.

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