

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

U.S. Patent No. 6,738,155 to Vogt et al.

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF
CLAIMS 1-20 OF
U.S. PATENT NO. 6,738,155
UNDER 35 U.S.C. § 312 AND 37 C.F.R. §42.104**

John M. Adams (Lead Counsel)
Reg. No. 26,697
Price & Adams, P.C.
4135 Brownsville Road
P.O. Box 98127
Pittsburgh, PA 15227-0127
Telephone No. (412)882-7170
Facsimile No. (412)884-6650
Email: paip.law@verizon.net

Lawrence G. Zurawsky (Back-up Counsel)
Reg. No. 22,776
Zurawsky & Associates
429 Forbes Avenue, Suite 600
Pittsburgh, PA 15219
Telephone No. (412)281-7766
Facsimile No. (412)281-7769
Email: szurawsky@aol.com

TABLE OF CONTENTS

I. MANDATORY NOTICES.....	1
A. Real Party In Interest.....	1
B. Related Matters.....	1
C. Counsel.....	1
D. Service Information.....	2
II. CERTIFICATION OF GROUNDS FOR STANDING.....	2
III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED.....	2
A. Prior Art Patent Documents.....	2
B. Prior Art Non-Patent Documents.....	3
C. Grounds of Challenge.....	4
IV. LEGAL PRINCIPLES.....	4
V. CLAIM CONSTRUCTION.....	5
A. The term "end user facility".....	6
B. The term "communication network"	6
C. The term "central service facility".....	7
D. The term "printing company facility".....	7
E. The term "communication routing device".....	7
F. The term "plate-ready file".....	7
VI. OVERVIEW OF THE '155 PATENT.....	8
A. Brief Description.....	8
B. Summary of the Prosecution History of the '155 Patent	9
VII. THE CHALLENGED CLAIMS ARE NOT PATENTABLE.....	18
A. Independent Claim 1 is Not Patentable.....	19

1. Claim 1 is Anticipated By Andersson et al. Under 35 U.S.C. §102(b)	19
2. Claim 1 is Obvious over Lucivero et al. in View of Andersson et al., Benson et al. And Sanders et al. Under 35 U.S.C. §103(a)	26
3. Claim 1 is Obvious over Lucivero et al. in View of Sands et al. and Buckley Under 35 U.S.C. §103(a)	32
B. Independent Claim 10 is Not Patentable.....	34
1. Claim 10 is Anticipated by Zilles in View Under 35 U.S.C. §102(b)	34
2. Claim 10 is Obvious Over Lucivero et al. in View Andersson et al. Under 35 U.S.C. §103(a).....	36
3. Claim 10 is Obvious Over Benson ('818) in View Of Buckley Under 35 U.S.C. §103(a).....	40
C. Independent Claim 16 is Not Patentable.....	42
Claim 16 is Obvious Over Lucivero et al. in View of Andersson et al., Sands et al., and Zilles Under 35 U.S.C. §103(a)	42
D. The Dependent Claims Recite Additional Features That Are Not Patentable	47
1. Dependent Claim 2.....	47

2. Dependent Claim 3.....48

3. Dependent Claim 4.....49

4. Dependent Claim 5.....49

5. Dependent Claim 6.....50

6. Dependent Claim 7.....51

7. Dependent Claim 8.....52

8. Dependent Claim 9.....52

9. Dependent Claim 11.....53

10. Dependent Claim 12.....54

11. Dependent Claim 13.....54

12. Dependent Claim 14.....55

13. Dependent Claim 15.....56

14. Dependent Claim 17.....57

15. Dependent Claim 18.....58

16. Dependent Claim 19.....58

17. Dependent Claim 20.....59

VIII. CONCLUSION..... 60

TABLE OF AUTHORITIES

	Page(s)
FEDERAL CASES	
<i>Biotech Biologische Naturverpackungen GmbH & Co. KG v. Biocorp, Inc.</i> 249 F.3d. 1341, 1349 (Fed. Cir. 2001).....	5
<i>KSR Int’l Co. v. Teleflex, Inc.</i> , 550 U.S. 398 (2007)	5
<i>In re Schreiber</i> , 128 F.3d 1473 (Fed. Cir. 1997)	4
<i>In re Yamamoto</i> , 740 F.2d 1569 (Fed. Cir. 2004)	5
FEDERAL STATUTES	
35 U.S.C. § 102	2, 3, 4,10,18
35 U.S.C. § 103	4,10,21,23,27,32,35,42
35 U.S.C. § 112	30,31
35 U.S.C. § 314(a)	4
REGULATIONS	
37 CFR 42.22(a)(1)	2
37 CFR 42.104	2, 17
37 C.F.R. § 42.100(b)	5
77 Fed. Reg. 48764 (Aug. 14, 2012)	5

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.