

IPR2014-00136

**Oral Argument for Parallel Networks
(Patent Owner)**

U.S. Patent No. 7,188,145

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Inohara does not disclose “allowing a client to join [a] cache community.”

- “A proper construction of ‘cache community’ is a common identity that shares, participates, and forms a fellowship to cache content.” *Response to Petition, Paper 23 at 2.*
- A construction of “allowing as meaning to permit the presence of...is consistent with the Specification of the ‘145 patent because it describes...that client 404 may be denied entry.” *Decision, Paper 15 at 14.*
- The cache community of Inohara is the “hierarchical cache that works by caching content at server groups forming branches of a hierarchical tree structure...” *Response to Petition, Paper 23 at 5.*
- “Inohara does not teach denying a server membership in...an individual server group.” *Declaration of Dr. Mitchell A. Thornton, Document 2002, Paragraph 43.*

Claim Construction

➤ Cache Community

- The Board construed “community to mean ‘similarity or identity’ or ‘sharing, participation and fellowship.’” *Decision, Paper 15, Page 13.*
- A “‘cache community’ is a common identity that shares, participates, and forms a fellowship to cache content.” *Response to Petition, Paper 23 at 2.*

➤ “Allowing”

- The Board construed “allowing” as “to permit the presence of.” *Decision, Paper 15 at 14.*
- According to the Board, such construction “is consistent with the Specification of the ‘145 patent because it describes...that client 404 may be denied entry.” *Decision, Paper 15 at 14.*

The Cache Community of Inohara

- “After studying the Inohara reference, I have concluded that Inohara’s primary premise of design is that membership in a cache architecture should not be limited...Inohara addresses the need for a cache system that is suitable for use for the world-wide web (the “Internet”). Inohara discussed problems that need to be solved for a cache system to function for a network as large as the Internet.” *Declaration of Dr. Mitchell A. Thornton, Document 2002, Paragraph 28.*
- Inohara’s solution is “a multi-cast hierarchy of server operation information by virtue of the mutual support of server groups. The multi-cast hierarchy includes groups of a tree structure formed by server groups.” *Inohara at 4:3-6.*

The Cache Community of Inohara

- “In Inohara, the cache hierarchy is described as being ‘mutually supporting,’ and as including “groups of a tree structure formed by server groups.” *Response to Petition, Paper 23 at 7.*
- A “cooperative cache...cooperate[s] in a single architecture to expand the amount of cached content available to users of the cooperative cache. In addition to the goal of reducing the delay penalty of object retrieval, the goals of such an architecture are to increase the likelihood of finding an object within the cache, or the ‘hit rate.’” *Declaration of Dr. Mitchell A. Thornton, Document 2002, Paragraph 21.*
- A “‘wide-area cooperative cache management protocol’ is provided. This protocol performs the propagation of a cache directory (a list of URLs in caches) using the multi-cast hierarchy formed by the above-mentioned server status propagation protocol and a cache control (which URL does which server hold in a cache, and when is which URL to be transferred from a certain server to another server)...” *Inohara, 4:23-31.*

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