UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RPX Corporation,
Petitioner,

v.

Macrosolve, Inc.,
Patent Owner

PETITION FOR INTER PARTES REVIEW

OF

U.S. PATENT NO. 7,822,816

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

PETITIONER'S EXHIBIT LIST iv

I. Mandatory Notices 1

A. Real Party-in-Interest 1

B. Related Matters 1

C. Lead and Back-up Counsel and Service Information 4

II. Grounds for Standing 5

III. Relief Requested 5

IV. Reasons for the Requested Relief 5

A. Summary of the '816 Patent 5

B. Prosecution History 8

C. Summary of the Petition 10

V. Identification of Challenges and Claim Construction 10

A. Challenged Claims 10

B. Claim Construction 10

C. Statutory Grounds for Challenges 11

D. Multiple Independent Challenges are Not Cumulative or Duplicative 12

E. Identification of How the Construed Claims Are Unpatentable 14

1. Challenge #1: Claims 1-14 are rendered obvious under 35 U.S.C. § 103 by Dodgen in view of Sancho 14

2. Challenge #2: Claims 1 and 5-7 are rendered obvious under 35 U.S.C. § 103 by Richards in view of Porter 40

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

3. Challenge #3: Claims 2-4, 8-11, & 13-14 are obvious under 35 U.S.C. § 103 over Richards in view of Porter and further in view of Desai.....47

4. Challenge #4: Claim 12 is rendered obvious under 35 U.S.C. § 103 by Richards in view of Porter and Desai, and further in view of Jeter 59

VI. Conclusion 60

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

PETITIONER'S EXHIBIT LIST

November 11, 2013

RPX-1001	U.S. Patent No. 7,822,816 to Payne
RPX-1002	Prosecution File History of U.S. 7,822,816
RPX-1003	File History of *Ex Parte* Reexamination of U.S. 7822816, Control No. 90/012,829.
RPX-1004	Declaration of Dr. A.L. Narasimha Reddy Under 37 C.F.R. § 1.68
RPX-1005	Curriculum Vitae of Dr. A.L. Narasimha Reddy
RPX-1006	Macrosolve's Opening *Markman* Brief, *Macrosolve, Inc. v. Antenna Software, Inc.*, no. 6:11-cv-287-mhs-jdl, docket no. 433 (E.D. Tex. Aug. 16, 2013)
RPX-1007	Macrosolve's Reply *Markman* Brief, *Macrosolve, Inc. v. Antenna Software, Inc.*, no. 6:11-cv-287-mhs-jdl, docket no. 441 (E.D. Tex. Sept. 13, 2013)
RPX-1008	Merriam-Webster Dictionary, *available at* www.merriam-webster.com (selected entries)

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

RPX-1009	THE FACTS ON FILE DICTIONARY OF COMPUTER SCIENCE, 4th ed., edited by Valerie Illingworth &John Daintith (Market House Books Ltd. 2001) (selected pages)
RPX-1010	MCGRAW-HILL DICTIONARY OF SCIENTIFIC AND TECHNICAL TERMS, 4th ed. (selected pages)
RPX-1011	U.S. Patent No. 6,453,329 to Dodgen
RPX-1012	Debra Sancho & Ivan Phillips, THE OFFICIAL PENDRAGON FORMS FOR PALMOS STARTER KIT (2000)
RPX-1013	U.S. Copyright Office Copyright Registration Record for RPX-1012
RPX-1014	U.S. Publication No. 2002/0147850 by Richards
RPX-1015	U.S. Patent No. 6,163,811 to Porter
RPX-1016	U.S. Patent No. 6,618,746 to Desai et al.
RPX-1017	WO 00/57976 by Jeter
RPX-1018	James J. Kistler and M. Satyanarayanan, "Disconnected Operation in the Coda File System," ACM TRANSACTIONS ON COMPUTER SYSTEMS, vol. 10, no. 1, pp. 3-25 (Feb. 1992)

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.