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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WAVEMARKET, INC. D/B/A LOCATION LABS
Petitioner

v.

LOCATIONNET SYSTEMS, LTD.
Patent Owner

Case No. IPR2014-00199
U.S. Patent 6,771,970

**LOCATIONNET SYSTEMS, LTD.'S
PATENT OWNER RESPONSE**

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EXHIBIT LIST

- Exhibit No. 2016:** Declaration of Dr. Narayan Mandayam in Support of Locationet Systems, Ltd.'s Patent Owner Response
- Exhibit No. 2017:** Definition of "database," Dictionary of Computer Words, Houghton Mifflin Company (1998), p. 61
- Exhibit No. 2018:** Definition of "database," Personal Computer Dictionary, Random House (2nd Ed. 1996), p. 126
- Exhibit No. 2019:** Definition of "engine," Webster's New World Dictionary of Computer Terms, Macmillan (5th ed. 1994), p. 208

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I. Introduction

Pursuant to 35 U.S.C. § 316(a)(8) and 37 C.F.R. § 42.120, the Patent Owner hereby submits its Response to the Institution Decision (Paper 18) on May 9, 2014.

On November 27, 2013, Wavemarket, Inc. d/b/a Location Labs (collectively “Petitioner”) filed a Petition¹ to institute an *inter partes* review of claims 1-19 of U.S. Patent No. 6,771,970 (“the ‘970 patent”; Ex. 1001). On May 9, 2014, the Board instituted this *inter partes* review (“IPR”) proceeding of U.S. Patent No. 6,771,970 on only one ground proposed by Petitioner: anticipation under 35 U.S.C. § 102(e) of claim 18 by U.S. Patent No. 6,243,039 (“Elliot”; Ex. 1003). The Board denied all of the other grounds proposed by Petitioner for all of the other challenged claims. Paper 18 at 29.

Patent Owner will show that Petitioner’s argument has no merit. Elliot fails to disclose multiple elements expressly required by claim 18. As explained herein and in the accompanying declaration of Dr. Narayan Mandayam (Ex. 2016), Petitioner’s argument that Elliot anticipates claim 18 fails for three reasons. First, Elliot fails to disclose a “map database,” as required by claim 18. Second, Elliot fails to disclose a “map engine” for manipulating the map database, as required by claim 18. Third,

¹ The Petitioner subsequently filed a corrected Petition for *Inter Partes* Review on December 19, 2013 (Paper 6).

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