UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Motorola Mobility LLC, Google Inc. and Apple Inc.,

Petitioners,

v.

Arendi S.A.R.L.,

Patent Owner.

Case No. IPR2014-00203

Patent No. 8,306,993

PATENT OWNER ARENDI S.A.R.L.'S PRELIMINARY RESPONSE

UNDER 35 U.S.C. § 313 and 37 C.F.R. § 42.107

DOCKET ALARM

Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

TABLE OF AUTHORITIES iii

EXHIBIT LIST iv

I. INTRODUCTION 1

II. OVERVIEW OF THE '993 PATENT 1

III. CLAIM CONSTRUCTION 7

A. "allowing the user to make a decision whether to store at least part of the first contact information in the contact database as a new contact or to update an existing contact in the contact database" means presenting to the user a choice between competing alternatives of storing a new contact or updating an existing contact. 8

IV. OVERVIEW OF THE PRIOR ART 12

A. Overview of Drop Zones 12

B. Overview of LiveDoc 15

C. Overview of Magnanelli 18

D. Overview of Luciw 19

E. Overview of Bates 22

F. Overview of Giordano 24

V. SINCE THE PRIOR ART DOES NOT ANTICIPATE OR RENDER ANY CLAIM OBVIOUS, NO *INTER PARTES* REVIEW SHOULD BE INITIATED 25

A. Overview of Reasons for Denying Inter Parties Review 25

B. Because an action can be triggered in the Drop Zones system only after entering two execute commands, Drop

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

Zones fails to disclose "providing for the user an input device configured so that a single execute command from the input device is sufficient to cause the performing", and therefore Ground 1 fails to establish a *prima facie* case for obviousness. 27

C. Because neither Drop Zones nor Magnanelli discloses "allowing the user to make a decision whether to store at least part of the first contact information in the contact database as a new contact or to update an existing contact in the contact database", Ground 1 for this additional reason fails to establish a *prima facie* case for obviousness. 32

D. Because Luciw's handling of a search input does not involve identifying the input as contact information, Luciw fails to disclose "analyzing in a computer process textual information in a document … to identify a portion of the document as first contact information, without user designation of a specific part of the textual information to be subject to the analyzing", and therefore Ground 3 fails to establish anticipation by Luciw. 34

E. Because none of Luciw, Giordano, or Bates discloses or suggests "allowing the user to make a decision whether to store at least part of the first contact information in the contact database as a new contact or to update an existing contact in the contact database", Ground 4 fails to establish a *prima facie* case for obviousness and Ground 3 fails for this additional reason to establish anticipation by Luciw..... 43

F. Because none of Luciw, Giordano, and Bates discloses or suggests "providing for the user an input device configured so that a single execute command from the input device is sufficient to cause the performing", for this additional reason Ground 4 fails to establish a *prima facie* case for obviousness and Ground 3 fails for this additional reason to establish anticipation by Luciw. 50

VI. CONCLUSION 53

CERTIFICATE OF SERVICE 54

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

TABLE OF AUTHORITIES

Cases

Phillips v. AWH Corp., 415 F.3d 1303, 1316 (Fed. Cir. 2005) 7

Statutes

35 U.S.C. § 314 1

37 C.F.R. § 42.100(b) 7

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

EXHIBIT LIST

Arendi Exhibit Number	Description
2001	Third Supplement to Response H, filed November 3, 2011, for Serial No. 11/745,186, the application for the '993 Patent
2002	Miller and Bonura, "From documents to objects: An overview of LiveDoc", 30 SIGCHI Bulletin No. 2, 53-58.

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.