#### UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

## SONY CORPORATION Petitioner

v.

#### INNOVATIVE COMMUNICATIONS TECHNOLOGIES, INC. (now STRAIGHT PATH IP GROUP, INC.) Patent Owner

Patent No. 6,009,469

Filing Date: September 25, 1996

Issue Date: December 28, 1999

Title: GRAPHIC USER INTERFACE FOR INTERNET TELEPHONY APPLICATION

Inter Partes Review No. IPR2014-00231, Filing Date December 5, 2013

PATENT OWNER'S PRELIMINARY RESPONSE **TO PETITION FOR INTER PARTES REVIEW** 



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	E.	Petitioner's Construction for "Determining the Currently Assigned Network Protocol Address [] Upon Connection to the Computer Network" Eliminates Claim 1's Dynamic Addressing Requirement					
II.	PETITIONER HAS FAILED TO DEMONSTRATE THAT EACH LIMITATION OF THE CHALLENGED CLAIMS IS FOUND IN THE ASSERTED PRIOR ART						
	A.	The Challenged Claims are Patentable over the Microsoft Manual in View of Either Palmer or Pinard					

1.	The Microsoft Manual Only Discloses a Database of Registered Computer Names, and Does Not Query the On-Line Status of a Process
2.	The Microsoft Manual in Combination with Palmer Does Not Render Obvious Claims 3, 9-10, and 17-18 Because the References Do Not Teach a Query into the On-Line Status of a Process
3.	The Microsoft Manual in Combination with Palmer and Pinard Does Not Render Obvious Claims 9-10 and 17-18 Because the References Do Not Teach a Query into the On-Line Status of a Process
4.	The Microsoft Manual in Combination with Palmer Does Not Render Obvious Claims 1-3 Because the References Do Not Teach Transmitting a Unique Identifier of a Process
Dyna	Claims Require Either a Query into On-Line Status or mic Addressing, and are Therefore Patentable over IChat, Alone or in Combination with Pinard or RFC 154140
1.	VocalChat Does Not Teach a Query into On-Line Status of a Process
2.	VocalChat, Alone or in Combination with Pinard, Does Not Render Obvious the Query into On-Line Status of Claims 3, 9-10, and 17-18
3.	VocalChat, Alone or in Combination with RFC 1541, Does Not Render Obvious the Dynamic Addressing or Unique Identifier Requirement of Claims 1-347
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B.

C.	1993	e-1994 in Combination with RFC 791, RFC 1541, Little- 3, or Pinard Does Not Teach the Required Point-to-Point munication with a Second Process
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	2.	The Asserted References Do Not Teach the Required Connection Between Two Processes
		<ul> <li>a. Little-1994 Does Not Teach a Point-to-Point Communication with a Second Process, Receiving the Network Protocol Address of a Second Process, or Establishing a Communication Responsive to the Network Protocol Address</li></ul>
		<ul> <li>b. Little-1994 in Combination with RFC 791, RFC 1541, Little-1993, or Pinard Do Not Render Obvious Claims 1-3, 9-10, or 17-18 Because the References Do Not Teach Communication with a Second Process</li></ul>
	3.	Little-1994 in Combination with RFC 791 and RFC 1541 Does Not Render Obvious Claims 1-3 Because Petitioner Has Not Established the Obviousness of Combining RFC 1541 with Little-1994
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### **TABLE OF AUTHORITIES**

<b>Cases</b> <i>CFMT, Inc. v. YieldUp Int'l Corp.</i> , 349 F.3d 1333 (Fed. Cir. 2003)	7
<i>In re Bond</i> , 910 F.2d 831 (Fed. Cir. 1990)	8
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<b>Statutes</b> 35 U.S.C. § 314(a)	2,7
<b>Regulations</b> 37 C.F.R. § 42.100(b)	8

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