UNITED STATES PATENT AND TRADEMARK OFFICE
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BEFORE THE PATENT TRIAL AND APPEAL BOARD
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GOOGLE INC. and MOTOROLA MOBILITY LLC
Petitioners
v.

ARENDI S.A.R.L.
alleged Patent Owner

IPR2014-00452

Patent 6,323,853

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PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE

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UPDATED EXHIBIT LIST

Exhibit No.	Exhibit Description
1001	U.S. Pat. No. 6,323,853 ("the '853 patent")
1002	Declaration of Dennis Allison
1003	U.S. Pat. No. 5,923,848 ("Goodhand")
1004	Padwick, et al., "Using Microsoft Outlook 97" (Microsoft Press) 1996 (Chapters 1, 8-9, 12-13, 19-20, 22, 24 only)
1005	U.S. Pat. No. 6,026,410 ("Allen")
1006	U.S. Pat. No. 5,644,735 ("Luciw")
1007	Bonura and Miller, "Drop Zones An Extension to LiveDocs", SIGCHI Bulletin Volume 30, Number 2 April 1998.
1008	Curriculum Vitae of Dennis Allison
1009	U.S. Pat. No. 5,754,306 ("Taylor")
1010	U.S. Patent No. 5,790,532 ("Sharma")
1011	U.S. Pat. No. 5,859,636 ("Pandit")
1012	Magnanelli, et al., "ACADEMIA: An Agent-Maintained Database based on Information Extraction from Web Documents", 14th European Meeting on Cybernetics and Systems Research on April 15, 1998.
1013	Structure of the LC Control Number, http://www.loc.gov/marc/lccn_structure.html
1014	Preliminary Infringement Analysis for Defendant Google, U.S. Pat. No. 7,496,854 (highlighting added)
1015	Declaration of Robert Kent in support of Motion Pro Hac Vice

1016	Deposition Transcript of Dr. John Levy, January 8, 2015 ("Levy Dep.")

Arendi makes several different arguments that center on the same basic critique of Goodhand: that users are "required" to type "contact information" into the "To:" line of an email form. (Patent Owner Response ("POR"), p. 22). Arendi calls this a "selection" of contact information, leading Arendi to the conclusion that Goodhand must not be performing the "analyzing" step of claim 1. (POR, p. 1). Arendi further argues that claim 1 excludes *any* user action prior to the execute command. (POR, p. 17).

Arendi's contentions are mistaken. The Goodhand prior art renders the claim language obvious—even under Arendi's proposed claim constructions. Those constructions, in turn, are based on a misapplication of law. Arendi offers no other basis for patentability.

I. GOODHAND RENDERS THE GROUND 1 CLAIMS OBVIOUS EVEN UNDER ARENDI'S NARROWED CONSTRUCTION OF CLAIM 1

Even under Arendi's claim construction, Goodhand renders the claim language obvious. Goodhand obviously performs an analysis to determine if "first information" is present, and therefore does not require "selection". This was proven by Arendi's own expert.

A. Goodhand renders obvious the claimed "analyzing" step

Arendi's expert witness, Dr. Levy, reports that he conducted an experiment with Microsoft Outlook (Ex. 2008, ¶¶27-28). According to Dr. Levy, the functionality

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