

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.,
SAMSUNG ELECTRONICS AMERICA, INC. AND SAMSUNG
ELECTRONICS CO., LTD.
Petitioners

v.

MICROGRAFX, LLC
Patent Owner

Case IPR2014-00532
Patent 5,959,633

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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I. Claim interpretations	1
A. Broadest Reasonable Interpretation standard should be applied under 37 C.F.R. § 42.100(b)	1
B. “external shape stored outside the computer program” (claims 1, 8)	1
C. “delegate” (claims 1, 2, 8, 9)	3
II. Walton discloses “an external shape stored outside the computer program”	4
III. Walton discloses a “computer program further operable to: . . . delegate the production of a graphical image of the external shape to the external capabilities.”	7
IV. The obvious combination of Eick in view of Kruglinski would provide an external class (at least an external FloatDraw class) having external capabilities.	11
V. Eick teaches additional graphical image drawing classes that can be implemented as DLLs using the teachings of Kruglinski	13
VI. Eick does not teach away from implementing the classes and class libraries of Eick as DLLs as taught by Kruglinski	14

EXHIBIT LIST

- GOOGLE1001 U.S. Patent No. 5,959,633 to McFarland et al. (“the ’633 patent”)
- GOOGLE1002 Prosecution History of the ’633 patent (Serial No. 08/726,091)
- GOOGLE1003 Declaration of Dr. Anselmo Lastra
- GOOGLE1004 U.S. Patent No. 5,883,639 to Walton et al. (“Walton”)
- GOOGLE1005 U.S. Patent No. 5,564,048 to Eick et al. (“Eick”)
- GOOGLE1006 Select portions of *Inside Visual C++, Second Edition: Version 1.5* by David J. Kruglinski, September 1, 1994 (“Kruglinski”)
- GOOGLE1007 Select portions of *The American Heritage Dictionary of the English Language* (3rd ed. 1992)
- GOOGLE1008 *Micrografx, LLC, v. Google, Inc. and Motorola Mobility, LLC*, Civil Action No. 3:13-cv-03595-N, Plaintiff Micrografx, LLC’s Preliminary Disclosure of Asserted Claims and Infringement Contentions dated January 6, 2014
- GOOGLE1009 Almeling Declaration In Support of Google’s Motion for *Pro Hac Vice* Admission
- GOOGLE1010 Second Declaration of David S. Almeling in Support of Petitioners’ Motion for *Pro Hac Vice* Admission
- GOOGLE1011 Second Declaration of Dr. Anselmo Lastra
- GOOGLE1012 Transcript of the Deposition of Mr. Garry Kitchen

Case IPR2014-00532
U.S. Patent No. 5,959,633
Our Ref. 19473-0309IP1

GOOGLE1013	Assignment history of the '633 patent
GOOGLE1014	Select portions of <i>The C++ Programming Language, Second Edition</i> by Bjarne Stroustrup, June 1993 ("Stroustrup")
GOOGLE1015	U.S. Patent No. 5,999,987 to O'Farrell et al. ("O'Farrell")
GOOGLE1016	U.S. Patent No. 5,923,877 to Berner et al. ("Berner")
GOOGLE1017	PCT Pub. No. WO/1996/008765 to Foody et al. ("Foody")
GOOGLE1018	U.S. Patent No. 4,622,633 to Ceccon et al. ("Ceccon")
GOOGLE1019	U.S. Patent No. 5,475,817 to Waldo et al. ("Waldo")
GOOGLE1020	European Patent Pub. No. EP0567699 A1 to Barman ("Barman")
GOOGLE1021	U.S. Patent No. 5,726,979 to Henderson et al. ("Henderson")
GOOGLE1022	Reserved
GOOGLE1023	Patent Owner's Response for IPR2014-00532 (NOT FILED)

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TABLE OF AUTHORITIES

Case Law

<i>In re Cuozzo Speed Technologies, LLC</i> , ___ F.3d ___, 2015 WL 448667 (Fed. Cir. 2015)..	1
<i>In re Paulsen</i> , 30 F.3d 1475, 1480 (Fed. Cir. 1994)	2

Decisions of the Patent Trial and Appeal Board

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<i>Intel Corporation v. Fuzzysharp Technologies, Inc.</i> , IPR2014-00001 Paper 23	13

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