UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MASTERCARD INTERNATIONAL INCORPORATED Petitioner

v.

D'AGOSTINO, JOHN Patent Owner

Case IPR2014-00544 Patent 7,840,486

PATENT OWNER'S RESPONSE UNDER 37 C.F.R. § 42.120

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		(a)	Cohen's merchant type limit does not satisfy the claim limitation "prior to any particular	
			merchant being identified"	21
		(b)	Cohen's type of stores and type of charges limits do not create a limit to a single merchant	22
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			group of stores	24
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		(<i>f</i>)	The ex parte reexamination of the '988 patent	
			confirmed that Cohen does not disclose limiting purchases to a single merchant before	
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			single merchant	27
	(2)	Col	hen does not disclose designating/selecting a	
	(-)		ment category that places limits on a transaction	
			le before the transaction is generated	
B.	Cla	ims	16-21 of the '486 patent are not obvious over	
			and Musmanno (Ground 2)	

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	C. The terminal disclaimer filed during examination of the	
	'988 patent was not an admission that the '486 patent	
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