

IN THE UNITED STATES PATENT & TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

Eastman Kodak Company, Agfa Corporation,  
Esko Software BVBA, and Heidelberg, USA,  
Petitioners,

v.

CTP Innovations, LLC,  
Patent Owner.

---

Case IPR2014-00788  
Patent U.S. 6,738,155

---

**PETITION FOR *INTER PARTES* REVIEW OF  
CLAIMS 10-20 OF U.S. PATENT NO. 6,738,155  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, Virginia 22313-1450

## TABLE OF CONTENTS

EXHIBIT LIST .....	iii
I. INTRODUCTION .....	1
II. MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8 .....	1
A. Real Party-In-Interest .....	1
B. Related Matters.....	1
1. Related Litigation.....	1
2. Related Applications.....	2
3. Related PTAB Proceedings.....	2
C. Lead and Back-Up Counsel.....	2
D. Service Information.....	2
III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED.....	3
A. Grounds for Standing .....	3
B. Identification of Challenge.....	4
IV. Background OF THE ‘155 PATENT .....	7
A. Background of the Technology and Overview of the ‘155 Patent.....	7
B. Prosecution History of the ‘155 Patent .....	13
C. IPR2013-00489 .....	17
V. CLAIM CONSTRUCTION .....	20
A. “providing . . . to a remote client in real time using a communication network” or “provided in real time using a wide area communication network” .....	21
B. “plate-ready file” .....	21
VI. LEVEL OF ORDINARY SKILL IN THE ART .....	22
VII. THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE ’155 PATENT IS UNPATENTABLE .....	23

*Inter Partes* Review of U.S. Patent No. 6,738,155

A.	Claims 10-13 and 15-20 are Rendered Obvious by Jebens and Apogee .....	23
B.	Claim 14 is Rendered Obvious by Jebens, Apogee, and Andersson .	37
C.	Statement of Non-redundancy.....	38
D.	Claims 10-13 are Rendered Obvious by Dorfman and Apogee .....	39
E.	Claims 14-15 are Rendered Obvious by Dorfman, Apogee, and Andersson.....	48
F.	Claims 16-20 are Rendered Obvious by Dorfman, Apogee, and the OPI White Paper.....	51
VIII.	CONCLUSION.....	58

**EXHIBIT LIST**

- 1001 U.S. Patent No. 6,738,155 to Rosenlund et al.
- 1002 Listing of pending litigations involving the '155 patent
- 1003 Excerpts from the prosecution history of U.S. Patent No. 6,738,155
- 1004 Decision Denying Petition to Institute in IPR2013-00489
- 1005 U.S. Patent No. 6,321,231 to Jebens et al.
- 1006 International Publication No. WO 98/08176 to Dorfman et al.
- 1007 Agfa Apogee, *The PDF-based Production System*
- 1008 Apple OPI White Paper
- 1009 *PDF Printing and Publishing, The Next Revolution After Gutenberg*
- 1010 *Computer-to-Plate: Automating the Printing Industry*
- 1011 CTP Original Impressions Complaint
- 1012 ifra Special Report, *Picture Replacement Techniques for Newspapers*
- 1013 Adobe PostScript Extreme, *Adobe Solutions for Commercial Printing*
- 1014 *Teaching Acrobat New Tricks*
- 1015 *PDF for Prepress Workflow and Document Delivery*
- 1016 *Envision tomorrow: PDF, the next generation of publishing workflows*
- 1017 Agfa Apogee, *The Future of Production Workflows*
- 1018 *Open Prepress Interface—Version 2.0*
- 1019 *Planning and Managing AppleTalk Networks*

*Inter Partes* Review of U.S. Patent No. 6,738,155

1020      *Resolving AppleTalk WAN routing Woes*

1021      Declaration of Professor Brian P. Lawler

1022      Declaration of Johan Suetens

# 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.