

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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PRINTING INDUSTRIES OF AMERICA

Petitioner

v.

CTP INNOVATIONS, LLC

Patent Owner

U.S. Patent No. 6,738,155 to Vogt et al.

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF  
CLAIMS 1-20 OF  
U.S. PATENT NO. 6,738,155  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. §42.104**

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## EXHIBITS

- 1101 '155 patent
- 1102 Office action dated January 29, 2003
- 1103 Amendment dated February 4, 2004
- 1104 Andersson et al., *PDF Printing and Publishing*, Micro Publishing Press 1997
- 1105 The Lucivero et al. patent (U.S. Patent No. 7,242,487)
- 1106 The Benson et al. patent European Patent Application No. EP0878303
- 1107 The Sands et al. patent (U.S. Patent No. 5,634,091)
- 1108 Buckley, "A Framework for Digital Data Workflow in a Graphic Arts System", *TAGA Proceedings*, Technical Association of the Graphic Arts, 1997
- 1109 Zilles, "Using PDF for Digital Data Exchange", *TAGA Proceedings*, Technical Association of the Graphic Arts, 1997
- 1110 The Holub patent (U.S. Patent No. 6,043,909)
- 1111 The Dorfman et al. patent (European Patent Application No. EP0920667)
- 1112 The Benson patent (U.S. Patent No. 6,046,818)
- 1113 Aldus Corporation, "OPI Open Prepress Interface Specification 1.3", 1993
- 1114 Adams II et al., "Computer-to-Plate" Automating the Printing Industry", *GAFT*, 1996

## I. MANDATORY NOTICES

### A. Real Party in Interest

Printing Industries of America ("Petitioner") is a real party-in-interest and submits this Petition for *Inter Partes* Review ("Petition") of claims 1-20 of U.S. Patent No. 6,738,155 ("the '155 patent") (Ex. 1101). Additional real parties-in-interest herein are identified in Appendix A.

### B. Related Matters

The litigation matters listed in Appendix B hereto would affect or could be affected by a decision in this proceeding. Petitioner is not a party to any of the lawsuits listed in Appendix A but has an interest in the outcome of the lawsuits.

In all of the lawsuits listed in Exhibit B, where CTP Innovations LLC ("CTP") is identified as plaintiff, CTP has asserted infringement of the '155 patent and U.S. Patent No. 6,611,349 ("the '349 patent") against the named defendants. The '155 and '349 patents disclose the same subject matter but claim different subject matter. A second petition for *inter partes* review of the '349 patent (claims 1-14) has been filed by petitioner.

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**II. CERTIFICATION OF GROUNDS FOR STANDING**

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

**III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED**

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)-(2), Petitioner challenges claims 1-20 of the '155 patent (Ex. 1101), and requests that each challenged claim be cancelled.

**A. Prior Art Patent Documents**

Petitioner relies upon the following patent documents:

1. U.S. Patent No. 7,242,487 ("Lucivero et al.;" Ex. 1105) which issued on July 10, 2007 and is prior art under 35 U.S.C. § 102(e).



2. European Patent Application No. EP0878303 ("Benson et al.; Ex. 1008) which was published on November 18, 1998 and is prior art under 35 U.S.C. § 102(e).
3. U.S. Patent No. 5,634,091 ("Sands et al."; Ex. 1007) which issued on May 27, 1997 and is prior art under 35 U.S.C. § 102(b).
4. U.S. Patent No. 6,643,909 ("Holub; Ex. 1110) which issued on March 28, 2000 and is prior art under 35 U.S.C. § 102(b).
5. European Patent Application No. EP0920667 ("Dorfman et al."; Ex. 1015) which was published on June 9, 1999 and is prior art under 35 U.S.C. § 102(e).
6. U.S. Patent No. 6,646,818 ("Benson; Ex. 1112) which issued on April 4, 2000 and is prior art under 35 U.S.C. § 102(b).

None of the above patent publications were applied by the Examiner during prosecution of the '155 patent.

#### **B. Prior Art Non-Patent Documents**

Petitioner relies upon the following non-patent documents:

1. Adams II et al., "Computer-to-Plate" Automating the Printing Industry", GAFT, 1996 (Ex. 1114)
2. Aldus Corporation, "OPI Open Prepress Interface Specification 1.3", 1993 (Ex. 1113)

3. Andersson et al., *PDF Printing and Publishing*, Micro Publishing Press 1997 (Ex. 1104)
4. Zilles, "Using PDF for Digital Data Exchange", *TAGA Proceedings*, Technical Association of the Graphic Arts, 1997 (Ex. 1109)

None of the above non-patent documents were applied by the Examiner during prosecution of the '155 patent.

#### **1. Grounds of Challenge**

Petitioner requests cancellation of claims 1-20, the challenged claims, as unpatentable under 35 U.S.C. §§ 102 and 103. This petition submits grounds showing that there is a reasonable likelihood that Petitioner will prevail with respect to at least one of the challenged claims and that each challenged claim is not patentable. See 35 U.S.C. § 314(a).

#### **IV. LEGAL PRINCIPLES**

The challenged claims are anticipated and/or obvious under 35 U.S.C. §§ 102 and 103, respectively. "To anticipate a claim, a prior art reference must disclose every limitation of the claimed invention, either explicitly or inherently."

See, e.g., *In re Schreiber*, 128 F.3d 1473, 1477 (Fed. Cir. 1997).

Even if the certain claims are not anticipated under 35 U.S.C. § 102, the claims are invalid if they would have been obvious. In *KSR*, the Supreme Court addressed the issue of

obviousness and held "The combination of familiar elements according to known methods is likely to be obvious when it does no more than yield predictable results." *KSR Int'l Co. v. Teleflex, Inc.*, 550 U.S. 398, 416 (2007)

Based on the prior art described in this petition, it is clear that the challenged claims are either anticipated or at least are merely a predictable combination of old elements that are used according to their established functions.

#### **V. CLAIM CONSTRUCTION**

A claim subject to *inter partes* review is given its "broadest reasonable construction in light of the specification in which it appears." 37 C.F.R. §42.100(b). The broadest reasonable construction is the broadest reasonable interpretation of the claim language. See *In Re Yamamoto*, 740 F.2d 1569, 1572 (Fed. Cir. 2004). Any claim term which lacks a definition in the specification is given the ordinary and customary meaning the term would have to a person skilled in the art. Such terms have been held to require no construction. *Biotech Biologische Naturverpackungen GmbH & Co. KG v. Biocorp, Inc.* 249 F.3d. 1341, 1349 (Fed. Cir. 2001).

Solely for purposes of this proceeding, the following discussion proposes constructions of certain claim terms and identifies support for these constructions. Any claim terms not included in the following discussion are to be given their

broadest reasonable interpretation in light of the specification as commonly understood by those of ordinary skill in the art.

Moreover, should the Patent Owner contend that the claims have a construction different from their broadest reasonable construction in order to avoid the prior art, the appropriate course is for the Patent Owner to seek to amend the claims to expressly correspond to its contentions in this proceeding. See 77 Fed. Reg. 48764 col. 2, ll. 53-61 (Aug. 14, 2012).

**A. The term "end user facility"**

Independent claim 1 recites the term "end user facility". Patent Owner has acted as its own lexicographer and has defined "end user facility" as providing "page building operations allowing the design and construction of pages from images, text, and data available via a communication network." '155 patent, col. 2: 55-58; Ex. 1001.

**B. The term "communication network"**

Independent claims 1, 10, and 16 recites the term "communication network". Patent owner has acted as its own lexicographer and has defined "communication network" as both a private network 160 (ATM network) and a public network 190 (the Internet) of subscribers and non-scribers to a printing and publishing system connected to central service facility 105. '155 patent, col. 4: 59-61, col. 5: 9-13; Ex. 1001.

**C. The term "central service facility"**

Independent claim 1 recites the term "central service facility". Patent Owner has acted as its own lexicographer and has defined "central service facility" as providing "storage, file processing, remote access, and content management operations. '155 patent, col. 2: 58-60; Ex. 1001.

**D. The term "printing company facility"**

Independent claim 1 recites the term "printing company facility". The Patent Owner has acted as its own lexicographer and has defined "printing company facility" as providing "printing operations for producing a printing plate from said plate-ready file." '155 patent, col. 2: 64-65; Ex. 1001.

**E. The term "communication routing device"**

Dependent claims 4 and 5 recite the term "communication routing device". Patent Owner has acted as its own lexicographer and has defined "communication routing device" as "routers and switches... included at central service facility 105, end user facility 300, and printing company facility 400." '155 patent, col. 4: 35-40; Ex. 1001.

**F. The term "plate-ready file"**

Independent claims 1, 10, and 16 recite the term "plate-ready file". The Patent Owner has defined "plate-ready file" as having "a file format capable of high resolution and is ready

for creation of a printing plate.” ‘155 patent, col. 2: 62-65; Ex. 1001. The proposed construction is “a file containing pages designed from images, texts, and data converted to a digital file for producing a printing plate.”

## **VI. OVERVIEW OF THE ‘155 PATENT**

### **A. Brief Description**

The patent application for the ‘155 patent (Ex. 1001) was filed in the U.S. Patent and Trademark Office on July 30, 1999. The ‘155 patent describes a system and method for communicating and managing printing and publishing services. The components of the system provide for remote printing and publishing services in real time where system components are installed at an end user facility, a printing company facility, and a central service facility. The components include hardware, firmware, and software components which enable the exchange, management and adaptation of data for the printing and publishing services provided. ‘155 patent, col. 2: 29-39; Ex. 1101.

The ‘155 patent identifies one embodiment of a printing and publishing system that generates a printing plate-ready file from data provided remotely in real time using a communication network. The printing and publishing system includes a central service facility and an end user facility and/or a printing company facility. The end user facility provides page building operations. The central service facility provides storage, file

processing, remote access, and content management operations. File processing operations include generating a plate-ready file from pages designed at the user facility. The plate-ready file has a file format capable of high resolution and is ready for creation of a printing plate. The printing company facility provides printing operations for producing a printing plate from the plate-ready file. *Id.* at col. 2: 50-65; Ex. 1101.

**B. Summary of the Prosecution History of the '155 Patent**

The patent application was filed on July 30, 1999. In a first Office Action dated January 29, 2003 (Ex. 1102) all claims 1-20 were rejected under 35 USC 103(a) as unpatentable and anticipated by U.S. Patent No. 6,321,231 (Jebens), in view of U.S. Patent No. 6,247,011 (Jecha, et al).

Original claim 4 was rejected under 35 USC 112, second paragraph, as being indefinite. Claim 4, line 2 recited a "printing customer facility", for which there was an insufficient antecedent basis in the claim.

Original claim 1 was an independent claim, and claims 2-9 depended from claim 1. Original claim 10 was an independent claim, and claims 11-15 depended from claim 10. Original claim 16 was an independent claim, and claims 17-20 depended from claim 16.

The Examiner also rejected all original claims 1-20 under 35 USC 103(a) as being unpatentable over Jebens, et al (U.S. 6,321,231) in view of Jecha, et al (U.S. 6,247,011).

With respect to claim 1, the Examiner stated that Jebens discloses a printing and publishing system comprising an end user facility (14) coupled to a communication network (figure 2); the end user facility page building operations including the construction of pages from images, text and data available via the network (which reads on the user preparing a document) (col 2, lines 40-46); a printing facility coupled to the network (the printer in part 10 of figure 2), and a central service facility (10) coupled to the communication network (figure 2); the central service facility providing storage (col 9, lines 13-20), file processing (col 9, lines 46-60), remote access (to enable searching) (col 9, lines 30-36), and content management (col 9, line 30 to col 10, line 52); the content management including the capture and archival (col 9, lines 13-29), retrieval and reuse (col 12, lines 25-65) of electronic (digital) files containing text (col 12, lines 25-65); content management operations further including the organization and cataloging of file content (by file name) (col 9, lines 21-25) for browsing, searching and retrieving of files and data (col 12, lines 10-65).



The Examiner stated further that Jebens does not clearly disclose providing pre-press services which provide imposition operations including the setting of pages on a particular plate as well as positioning and orientation of pages on the plate.

The Examiner concluded that it would have been obvious to have modified Jebens to provide pre-press services. Also it would have been obvious to have modified Jebens by the teaching of Jecha in order to give the user more control over how the final image is printed.

Concerning dependent claims 2-9 the Examiner explained that all the elements defined in each claim are disclosed by Jebens. No allowable subject matter was identified.

With respect to claims 10, 12 and 14, the Examiner stated that Jebens differs from claims 10, 12 and 14 in that Jebens does not clearly disclose generating a (PDF) file from the data and generating a plate ready file from the PDF file. However, the Examiner stated that Jecha discloses generating a (PDF) file from image data (col 4, lines 30-61) and generating a plate ready file which reads on a pre-press file from the PDF file (col 4, lines 54-61), and transmitting the data to a printer (col 4, lines 62-64), wherein the PDF file may be converted to Postscript (col 4, lines 54-61). Therefore, it would have been obvious to modify Jebens by the teaching of Jecha in order to

convert the data to a format which would be more easily processed by the printer.

With respect to claims 16, 18 and 19, the Examiner stated that Jebens differs from claims 16, 18 and 19 in that Jebens does not clearly disclose generating a PDF file from the data and generating a plate-ready file from the PDF file. However, Jecha discloses generating a PDF file from image data (col 4, lines 30-61) and generating a plate-ready file (which reads on a prepress file) from the PDF file (col 4, lines 54-61), and transmitting the data to a printer (col 4, lines 62-64), wherein the PDF file may be converted to Postscript (col 4, lines 54-61).

The Examiner concluded that it would have been obvious to have modified Jebens to generate a PDF file from the data and generate a plate-ready file from the PDF file. Further it would have been obvious to have modified Jebens by the teaching of Jecha in order to convert the data to a format which would be more easily processed by the printer.

Regarding claim 4, the Examiner rejected that claim under 35 USC 103(a) as unpatentable over Jebens in view of Jecha as applied to original independent claim 1, and further in view of Fujisawa, et al (U.S. No. 6,384,932).

In response to the first Office action, Applicants filed an Amendment on May 14, 2003. Applicants submitted the claims as

originally filed, with the exception of changing one word in claim 4 by substituting the word "company" for the previously used word, "customer". Therefore, Applicants argued that the rejection of claim 4 under 35 USC § 112, second paragraph, was overcome.

With respect to all of the remaining claims originally filed, Applicants traversed the rejection under 35 USC § 103(a) as unpatentable over Jebens in view of Jecha.

With respect to claim 1 Applicants argued that nothing in Jecha, suggests or teaches "imposition operations including the setting of pages on a particular plate as well as positioning orientation of pages on said plate" as recited in claim 1.

Applicants also argued that imposition is not the same as prepress and noted that Fujisawa teaches that the "prepress process" and "imposition" are separate from each other, stating further that Fujisawa Figure 1 shows a rasterized file as a result of prepress operations. After prepress, the rasterized file is used in impositioning operations and setting of pages on a plate. Applicants submitted further that neither Jebens nor Jecha disclose, suggest or teach anything about imposition operations in setting of pages on a plate.

With respect to claim 10 Applicants stated that claim 10 recites generating a portable document format PDF file from the design page layout and generating a plate-ready file from said

PDF file. Applicants argued that Jebens does not clearly disclose those elements and that Jecha discloses use of a translation program to translate documents into a file format suitable for prepress such as Postscript and that other formats suitable for prepress include HTML, PDF, and Postscript Extreme. Applicant stated that there is no teaching in Jecha of generating a portable document format PDF file from the design page layout and generating a plate-ready file from PDF file.

With respect to claim 16 Applicants noted that claim 16 recites the elements of providing PDF file to said remote client and providing a plate-ready file to a remote printer. Applicants argued that neither Jebens nor Jecha disclose either of those limitations.

On July 23, 2003, the Examiner issued a second non-final Office action, again rejecting independent claims 1, 10, and 16 under 35 USC 103(a) as unpatentable over Jebens (U.S. 6,321,231) in view of Fujisawa (U.S. 6,384,932).

With respect to claim 1, the Examiner repeated the prior rejection over Jebens, noting that Jebens differs from claim 1 in that, although Jebens discloses converting the data to an Open Prepress Interface file, Jebens does not clearly disclose providing prepress services which provide imposition operations.

With respect to the modification of Jebens by Fujisawa in the rejection of claim 1, the Examiner found that it would have

been obvious to have modified Jebens to provide prepress and imposition services in the printing system of Jebens. Further it would have been obvious to have modified Jebens by the teaching of Fujisawa in order to achieve labor savings in the plate making or printing process as well as to include the printing accuracy as disclosed by Fujisawa in the abstract.

With respect to independent claim 10, the Examiner found that Jebens discloses storing files containing information relating to images, text and data on a computer server and providing the files to a remote client for designing of a page layout. The Examiner stated that Jebens differs from claim 10, in that Jebens does not clearly disclose generating a PDF file from the data and generating a plate ready file from the PDF file.

Therefore, the Examiner concluded that it would have been obvious to have modified Jebens to generate a PDF file from the data and generate a plate ready file from the PDF file. Further, it would have been obvious to have modified Jebens by the teaching of Fujisawa in order to convert the data to a format which would be more easily processed by the printer.

With respect to independent claim 16, the Examiner argued that Jebens discloses storing high resolution files on the computer; generating low resolution files corresponding to high resolution files, and providing the low resolution files to a

remote client for the designing of a page layout (col 5, lines 11-22).

The Examiner found that Jebens differs from claim 16 in that Jebens does not clearly disclose generating a PDF file from the data and generating a plate ready file from the PDF file. The Examiner then concluded it would have been obvious to modify Jebens to generate a PDF file from the data to generate a plate ready file from the PDF file. Also, it would have been obvious to modify Jebens by the teaching of Fujisawa in order to convert the data to a format which would be more easily processed by the printer.

In response to the second non-final action, Applicants traversed the rejection of all claims 1-20 for the same reasons given in the final Office action. Applicants repeated the argument that "There is absolutely no disclosure, suggestion or teaching in Fujisawa where this 'page description language' is used to generate a plate-ready file." No amendments were made to the claims to overcome the cited prior art rejection.

On December 18, 2003 the Examiner issued a final rejection. (Ex. 1102). The Examiner found that Applicants' arguments were not persuasive. The Examiner repeated the grounds for rejection for all claims 1-20 and made the action final.

On July 4, 2004, Applicants filed an Amendment under 37 CFR §1.116 (Ex. 1103) responsive to the final action (Ex. 1102).

Claim 1 was amended by adding the limitations:

“and the generation of a portable document format (PDF) file; and generating a plate-ready file from said PDF file.” Dependent claims 2-9 were not amended. No amendments were made to the remaining claims 1-20.

Regarding the claim amendments, Applicants stated that the limitations added to claim 1 were previously included in independent claims 10 and 16. Applicants argued that there is no suggestion or teaching in Fujisawa of performing the operation of “generation of a portable document format (PDF) file” or “generating a plate-ready file from said PDF file”.

Applicants further argued that there is absolutely no disclosure, suggestion or teaching in Fujisawa where this “page description language file” is used to generate a plate-ready file nor is there any disclosure whatsoever of a PDF file.

Applicants reported at length from the publication by Adobe Systems Incorporated, entitled *The Adobe® PostScript® Printing Primer*, dated March 8, 1997 and from a second publication by Adobe Systems Incorporated, entitled *PDF for Prepress Work and Document Delivery Paper*, dated November, 1997. Referring to those publications, Applicants stated that a portable document format (PDF) file is not plate-ready. The PDF file is output

back into the PostScript language stream at print time. PDF files are converted to a Postscript format for purposes of plate output. PDF is considered a Postscript 3 format. Conventional hardware and software infrastructure is unavailable to accept PDF, but rather accepts Postscript level 2. Thus, PDF must be converted from Postscript 3 to Postscript level 2.

Regarding claims 10-15 Applicants argued that neither Jebens nor Fujisawa discloses, suggest or teaches "generating a portable document format (PDF) file from the design page layout" or "generating a plate-ready file from said PDF file".

Regarding claims 16-20 Applicants argued that neither Jebens nor Fujisawa discloses, suggests or teaches "generating portable document format (PDF) file from the page layout designed by said remote client".

In response to Applicants' 116 Amendment the Examiner issued a Notice of Allowance for all claims 1-20, as amended.

## **VII. THE CHALLENGED CLAIMS ARE NOT PATENTABLE**

The challenged claims recite features long known by clinicians who use printing and publishing systems to generate a printing plate-ready file. The structure and method steps defined in the challenged claims all have known functions that perform in expected ways. Based on the prior art described below, the claim limitations perform functions with predictable



results. There is no unexpected result on which to base the patentability of the claims.

Pursuant to Rule 42.104(b)(4)-(5) the specific grounds identified below show in detail the prior art disclosures that render the challenged claims anticipated and obvious.

**A. Independent Claim 1 is Not Patentable**

**1. Claim 1 is Anticipated by Andersson et al. under 35 U.S.C. §102(b).**

Andersson et al. (Ex. 1104) is directed to digital printing and specifically portable document format (PDF) printing and publishing. With regard to networked digital workflows, Andersson et al. discloses that the focus is on processing reengineering to achieve rapid response, short cycle time, quality failsafeing, on-line customer service, low transaction costs, low materials usage, minimum inventory costs, and minimum distribution costs. Networked digital workflows introduce new forms of printing and publishing by conducting all business over internets/intranets, establishing print networks for distributed printing, and publishing and document management services. Andersson et al., p 179; Ex. 1104.

The schematics on pages 172 and 173 of Andersson et al. illustrate examples of printing and publishing systems that utilize well-known prepress programs for creating page-layouts with text, illustration and images. It is disclosed that in the

traditional workflow the reproduction company sends FPO images to client. The client uses the layout applications of their choice. When it is time to send the work back to the reproduction company a PDF file is generated. *Id.* at p 172-173; Ex. 1104.

Insofar as content management, Andersson et al. discloses that the emerging digital infrastructure will propel inter-business communication, workflow and content management to new levels of performance, flexibility and service. *Id.* at p 178; Ex. 1104.

Distributed workflows are coordinated through network communications to common (synchronized) databases containing evolving content and product information, workflow schedule and current job status, business relationship and financial data, and management information. *Id.* at p 181; Ex. 1104.

Andersson et al. further discloses that networked digital content management involves file formats, standard page description language, and digital archives with dedicated librarian applications to index, search and retrieve data. Andersson et al. acknowledges the metaphors that are used to describe printing and publishing workflows that include "the market of one", "just in time printing and publishing", "mass customization of media", "on-demand", and "1-to-1 communications". *Id.* at p 179; Ex. 1104.

Regarding an end-user facility, Andersson et al. discloses that Postscript Level 3-Adobe provided an advanced level of functionality in Adobe Postscript Level 3 to accommodate the new digital document creation process. Users are able to access content for use in digital documents from varying sources including electric mail, Web pages, Intranets, on-line services, content providers, and digital cameras. Document composition now includes not only text, but also complex graphics, clip art, corporate logos, internet content, multiple fonts, scanned images, and color. *Id.* at p 12; Ex. 1104.

Andersson et al. discloses that a distiller is set up on a dedicated network computer where a number of users can drop postscript files into a watched folder. When the distiller encounters a postscript file in the folder, it creates a PDF and places the file in an "out" folder where the network users can then move or use the files. *Id.* at p 113, Ex. 1104.

Regarding imposition operations provided by a printing company, Andersson et al. discloses that form file and page-leveling position and rotation with recto and verso page controls provide accurate placement of impositions forms for plate-ready film or press-ready plates. One area in the prepress industry that has developed rapidly in the past couple of years is electronic imposition. Due to the prevalence of large format imagesetters and platesetters, many users are

turning to imposition programs for workflow automation. *Id.* at p 35; Ex. 1104.

Andersson et al. further discloses that some of the current imposition processes that are being implemented include standard and custom imposition layouts for sheet or web printing, form, file and page-level positioning and rotation, with verso/retro page controls, enhanced shingling, and bottling controls, on-screen preview of press sheets with all marks and pages in place and proportion. *Id.* at p 35; Ex. 1104.

Further, Andersson et al. discloses that a server may be added to the output function to store RIPPed files for later printout of the entire file of one or more of the color separations. This may be called a print server or a print spooler. The print server function as a print spooler/server to hold files for later printout or archiving. *Id.* at p 63; Ex. 1104.

Further, Andersson et al. discloses that once the document is in Acrobat 3.0 PDF form it is free to be anything it needs to be, such as paper, film, plate, proof, WWW, viewable file, data, document or image archive and more. Automated workflow tools open the PDF, save the pictures in a new form, and redistill the document for another purpose. In one example, pictures can be saved into an image database for access by clients as they bill documents for different publishing streams. With a totally

digital publication you can go directly to plate or digital press. In this manner files are moved through various operations on their way to uniform and predictable output. *Id.* at p 43; Ex. 1104.

Regarding a central service facility, Andersson et al. discloses that a server is a computer positioned in the network that has a large amount of disk storage that has shared software and information. A single server may store shared files and software and link to printers or other output devices and may also link to tape drives, storage media, modems and RIPs. *Id.* at p 51; Ex. 1104.

It is further disclosed that the server operates to shift the processing burden from individual workstations to a central server for more efficient printing and job handling. The server is simply a central (network) function that can run background tasks like automatic dropping or rastersizing a file for output to a printer, imagesetter, platemaker or whatever. *Id.* at p 65; Ex. 1104.

Regarding content management operations Andersson et al. discloses Adobe's Networks system for improving the ease of use of printer management. A printer with network's functionality includes a printer-based Web page, Web-based printer management, printing directly from the printer's Web, support for all

industry standard remote management technologies. *Id.* at p 13; Ex. 1104.

Further regarding networked digital workflows, Andersson et al. discloses that prepress, printing and post-press functions will become increasingly automated processes across networks. One of the hallmarks of networked digital workflows will be color-managed digital printing, proofing and remote proofing. Prep will move from files, imagesetters and imp setters towards databases, variable and custom data merge, and computer-to-film, computer-to-plate, and computer-to-press. *Id.* at p 181; Ex. 1104.

Andersson et al. further explains that networked digital content management involves file formats, standard page description languages, and digital archives with dedicated librarian applications to index, search and retrieve data. Networked digital business systems are fully integrated with work-in-process and content management. *Id.* at p 182; Ex. 1104.

Also, Andersson et al. discloses that the management of the digital network provides access to entire electronic archives of information. The archives are filled with just about anything from pages to sound to video. With cross-platform interoperability and sufficient band width for video/audio transmission it is possible for an advertiser to be able to send ads and/or commercials directly to publishers, broadcast media,

or even directly to online service subscribers. *Id.* at p 30; Ex. 1104.

Thus, as illustrated below, Andersson et al. anticipates claim 1 because it discloses all of the claim limitations.

Claim	Andersson et al. (Ex. 1104)
1. A printing and publishing system providing prepress, content management, infrastructure, and workflow services to system subscribers in real time using a communication network, the printing and publishing system comprising:	p. 172, 173, 178-181
an end user facility coupled to a communication network, the end user facility providing page building operations, the page building operations including the design and construction of pages from images, text, and data available via said communication network and the generation of a portable document format (PDF) file;	p. 12, 27, 113,171,173,180,181
a printing company facility coupled to said communication network, the printing company facility providing imposition operations and generating a plate-ready file from said PDF file, the imposition operations including the setting of pages on a particular plate as well as positioning and orientation of pages on said plate; and	p. 31, 35, 43, 63
a central service facility coupled to said communication network, the central service facility providing storage, file processing, remote access, and content management operations;	p. 29, 49, 52, 65, 76, 158, 178, 181
the content management operations including the capture, organization, archival, retrieval, and reuse of electronic files containing any one of text, graphics, photos, artwork, full pages, audio, video, and completed projects; content management operations further including the organization and cataloging of file content for browsing, searching, and retrieving of files and data.	p. 30, 43, 61, 62, 161, 176, 178, 181, 182

**2. Claim 1 is Obvious over Lucivero et al. in view of Andersson et al., Benson et al., and Sands et al. under 35 U.S.C. §103(a).**

Lucivero et al. (Ex. 1105) relates to an imagesetting and electronic prepress system. The system includes inputting, tracking, processing, queuing, storing, editing and printing of raster or bit map data. A method is disclosed for providing a nearly continuous output of raster images to a plurality of output devices, such as, imagesetters, platemakers, on-press imagers, digital proofers, digital color printers and the like. Lucivero et al. col. 1: 16-25; Ex. 1105.

The prepress system operates within a standard network environment. For example, the system includes RIPs configured to output compressed raster data over a standard network interface. *Id.* at col. 5: 41-45; Ex. 1105.

A system and method for processing raster data includes at least one input terminal for generating Postscript data, at least one raster image processor (RIP), for processing the PostScript data into raster data, and a PrintDrive system for managing and controlling the workflow of image files containing raster image data to a plurality of user selectable output devices.

Specifically, the Lucivero et al. patent discloses RIPs 10 and 12 receiving image data from the front-end 6 over a network serial data transfer interface 8. The image data is typically in the form of page description language, e.g. a PostScript or PDF or



other, object orient text representation of the image to be printed.

The front-end 6 creates, edits or otherwise prepares image data for printing in a specially half-tone black and white and color printing as may be output by an imagesetter or a platesetter for eventual image reproduction by a printing press using printing plates. *Id.* at col. 7: 58-63; Ex. 1105.

The prepress system, as disclosed by Lucivero et al., includes a plurality of RIPs 34 connected to network 35. A network 32 includes one or more front-ends 40, one or more PrintDriver 41, one or more servers 42 for storing image and other data files, a proofer 43 or other output device 44 and another computer system 45 which may be used for system administration. The network connected components may be local or remote to the PrintDrivers 41 and the PrintDrivers 41 may also be local or remote with respect to each other. *Id.* at col. 8: 29-40; Ex. 1105.

The PostScript data is processed into raster data and a PrintDrive system manages and controls the workflow of image files containing raster image data to a plurality of user selectable output devices. Once the image file data is received by the RIP, operations such as image screen, color separating imposition, trapping and various other prepress image preparation operations result in a final bit map image data file which heretofore has been transferred to the output device over a parallel data transfer

interface in order to provide an efficient data transfer rate, thereby keeping the output device operating at a desired operating speed. Lucivero et al. col. \_\_\_\_; Ex. 1105.

Once the image file data is received by the RIP, operators such as image screeners, color separating, imposition, trapping, and various other prepress image representation operators result in a final bit map image data file which heretofore has been transferred to the output device over a parallel data transfer interface in order to provide an efficient data transfer rate, thereby keeping the output device operating at a desired operating speed.

Lucivero et al. further discloses that the PPD generator is a set of PostScript files which when downloaded to a RIP, generate a new printer description file based on settings retrieved from a connected PrintDrive. PPD generation is a process by which an operator can automatically build a new PrintDrive printer description file. Lucivero et al. col 16: 28-32; Ex. 1105.

In order to overcome the disadvantages of the prior art, Lucivero et al. indicates that the present invention provides a system and method which allows a front-end user to input perimeters for a print job, select an offline engine or other output device including a proofer, and execute a print command without the need of the specific output device and/or print media having to be

contemporaneously connected to the system. *Id.* at col. 5: 11-17; Ex. 1105.

As above discussed with regard to Andersson et al. a PDF document once in Acrobat 3.0 PDF form is free to be anything it needs to be such as paper, film, plate, proof, WWW-reviewable file, data, document or image archive and more. Automated workflow tools open the PDF, save the pictures in a new form, and redistill the document for another purpose. In this manner the client has access to the image database for building documents for different publishing streams. With a totally digital publication the user can go directly to plate or digital press. Andersson et al., p 43; Ex. 1104.

Benson et al. (Ex. 1106) discloses on-press imaging of lithographic printing plates. In such systems, the press computer accepts printing jobs in digital form and operates the press to print the job. The press computer causes the various printing plates to be imaged in accordance with digital files containing color separations; data representing each separation as fed to an imaging device associated with the corresponding printing plate, and the imaging device. In response, a lithographic printing pattern is impressed on the plate in accordance with the data. Benson et al., col. 1: 44-46; Ex. 1106.

Sands et al. (Ex. 1107) discloses a digital page imaging (DPI) system for receiving customer transmitted technical document files

produced on a desktop publishing package. The DPI system electronically stores all press impositions for all printing presses and provides for press impositions and film layouts for every press form. The software is able to select customer pages from digital files randomly and place their images directly into proper press impositions for film flats and printing plates. Sands et al. col. 5: 56-64; Ex. 1107.

Sands et al. further discloses that the imposition module 114 uses data from the verification and form breakup modules 110 and 112, respectively, to impose incoming pages into a large page description language file used to generate film output to create offset plates or used to drive a direct-to-plate device. A number of files will be produced for the job, corresponding to the offset plates that are required to produce the job. Sands et al., col. 7: 63-67, col. 8: 1-2; Ex. 1107.

It would be obvious to one of ordinary skill in the art to combine the teachings of Lucivero et al. with the teachings of Andersson et al., Benson et al. and Sands et al. because all the prior art disclose processes utilized in imagesetting and electronic prepress systems and particularly the cited combination of references disclose the claim 1 limitations of generating a portable document format file and generating a plate-ready file from the PDF file which was found to be the limitation allowable in claim 1.

Thus as illustrated below, all the limitations of claim 1 are obvious based on the combination of Lucivero et al. in view of Andersson et al., Benson et al. and Sands et al.

Claim	Lucivero et al. (Ex. 1105), Andersson et al. (Ex. 1104), Benson et al. (Ex. 1106), Sands et al. (Ex.1107)
1. A printing and publishing system providing prepress, content management, infrastructure, and workflow services to system subscribers in real time using a communication network, the printing and publishing system comprising:	Lucivero et al. col. 1: 16-25; col. 5: 41-45; col. 6: 1-13, 26-37; col. 24: 52-57; col. 8: 28-40; col. 13: 19-24.
an end user facility coupled to a communication network, the end user facility providing page building operations, the page building operations including the design and construction of pages from images, text, and data available via said communication network and the generation of a portable document format (PDF) file;	Lucivero et al. col. 2: 33, 53-64; col. 5: 11-17, 41-45, 50-60; col. 6: 26-37; col. 7: 54-67; col. 8: 1-2; Fig. 1 Benson et al., col. 1: 44-46. Andersson et al., p 43.
a printing company facility coupled to said communication network, the printing company facility providing imposition operations and generating a plate-ready file from said PDF file, the imposition operations including the setting of pages on a particular plate as well as positioning and orientation of pages on said plate; and	Lucivero et al. col. 2: 65-67; col. 3: 1-9; Fig. 1; col. 7: 54-67; col. 8: 23-39 55-67, Fig. 2; col. 7: 54-67; col. 9: 1-29; Fig. 3. Sands et al., col. 5: 56-64; col. 7: 63-67; col. 8: 1-2.
a central service facility coupled to said communication network, the central service facility providing storage, file processing, remote access, and content management operations;	Lucivero et al. col. 4: 31-45; col. 7: 58-67; col. 8: 1-21; col. 8: 41-54; col. 4: 32-45.
the content management operations including the capture, organization, archival, retrieval, and reuse of electronic files containing any one of text, graphics, photos, artwork, full pages, audio, video, and completed projects; content management operations further including the organization and cataloging of file content for browsing, searching, and retrieving of files and data.	Lucivero et al. col. 21: 53-63; col. 7: 58-63; col. 8: 43-49.

**3. Claim 1 is obvious over Lucivero et al. in view of Sands et al. and Buckley under 35 U.S.C. §103(a).**

Lucivero et al., as discussed above *supra* at Section VII (A)(2) is directed to a system of for the inputting, tracking, processing, queuing, storing, editing and printing of raster or bit map data, and to a method for providing a nearly continuous output of raster images to a plurality of output devices, such as, imagesetters, platemakers, on-press imagers, digital proofers, digital color printers and the like. Lucivero et al. col.1: 16-25; Ex. 1105.

Sands et al. (Ex. 1107) as discussed above and incorporated by reference herein, discloses an imposition module 114 that uses data from verification and form breakup modules 110 and 112 to impose incoming pages into a large page description file used to generate film output to create offset plates or used to drive a direct-to-plate device. A number of files are produced for the job, corresponding to the output plates that are required to produce the job. Sands et al., col. 7: 63-64; col. 8: 1-7; Ex. 1107.

Buckley (Ex. 1108) relates to a basic desktop publishing system that connects the application or creative operation to an output device via driver and RIP. In a graphic arts system a creative source is linked to a production destination. The basic elements of such a system serve as the starting point for

describing the evolution of digital data processing and flow and graphic arts systems. The application is feature-rich editing software with a good user interface for capturing user intent and generating the desired document appearance, which is expressed in terms of an internal format. The driver converts the internal format to a PDL or a plate description language, such as PostScript or PDF (portable document format). Most high-end graphic arts applications have integrated drivers. The RIP converts the device-independent PDL into a device-dependent raster image for the target output device. The output device can be an imagesetter, direct to plate, direct to press, or a laser printer.

It would be obvious to one of ordinary skill in the art to combine the teachings of Lucivero et al., Sands et al., and Buckley because all of the prior art is directed to computer-to-plate technology and digital workflow environments.

Thus as illustrated below, all the limitations of claim 1 are obvious based on the combination of Lucivero et al. in view of Sands et al., and Buckley.

Claim	Lucivero et al. (Ex. 1105), in view of Sands et al. (Ex.1107) and Buckley (Ex. 1108)
1. A printing and publishing system providing prepress, content management, infrastructure, and workflow services to system subscribers in real time using a communication network, the printing and publishing system comprising:	Lucivero et al. col. 1: 16-25; col. 5: 41-45; col. 6: 1-13, 26-37; col. 24: 52-57; col. 8: 28-40; col. 13: 19-24.

<p>an end user facility coupled to a communication network, the end user facility providing page building operations, the page building operations including the design and construction of pages from images, text, and data available via said communication network and the generation of a portable document format (PDF) file;</p>	<p>Lucivero et al. col. 2: 33, 53-64; col. 5: 11-17, 41-45, 50-60; col. 6: 26-37; col. 7: 54-67; col. 8: 1-2; Fig. 1.</p>
<p>a printing company facility coupled to said communication network, the printing company facility providing imposition operations and generating a plate-ready file from said PDF file, the imposition operations including the setting of pages on a particular plate as well as positioning and orientation of pages on said plate; and</p>	<p>Lucivero et al. col. 2: 65-67; col. 3: 1-9; Fig. 1; col. 7: 54-67; col. 8: 23-39 55-67, Fig. 2; col. 7: 54-67; col. 9: 1-29; Fig. 3.</p> <p>Sands et al. col. 7: 63-64; col. 8: 1-7.</p> <p>Buckley, P 337.</p>
<p>a central service facility coupled to said communication network, the central service facility providing storage, file processing, remote access, and content management operations;</p>	<p>Lucivero et al. col. 4: 31-45; col. 7: 58-67; col. 8: 1-21; col. 8: 41-54; col. 4: 32-45.</p> <p>Buckley, p 342, 343.</p>
<p>the content management operations including the capture, organization, archival, retrieval, and reuse of electronic files containing any one of text, graphics, photos, artwork, full pages, audio, video, and completed projects; content management operations further including the organization and cataloging of file content for browsing, searching, and retrieving of files and data.</p>	<p>Lucivero et al. col. 21: 53-63; col. 7: 58-63; col. 8: 43-49.</p> <p>Buckley, p 339, 340.</p>

**B. Independent Claim 10 is Not Patentable**

**1. Claim 10 is Anticipated by Zilles Under 35 U.S.C. §102(b)**

Zilles (Ex. 1109) relates to the use of the Portable Data Format (PDF) for the electronic transmission of graphic works throughout the production workflow to final production, either as a final image on media or a surrogate for the image, such as a printing plate. Zilles discloses the object-based approach to the



digital, electronic representation of graphic arts presentations. Zilles, p 308-309; Ex. 1109. Zilles indicates that the object-based exchange formats are based on the Adobe imaging model which utilizes the PostScript language to create, display and print Portable Document Format (PDF) files. This format was developed so users could view and manage documents on-screen in a device and in an application-independent manner. *Id.* at p 312-313; Ex. 1109.

In one example, Zilles discloses PDF for document delivery by a graphic designer creating a design for a brochure. The designer obtains the images needed in photographic form and sends them to a printer for scanning and storage of the high resolution images. The printer returns EPS files with FPO (for placement only) images and OPI comments describing the high resolution files. The graphic designer creates a document in a page layout program, including the FPO images received from the printer. The designer then outputs the document to a PDF file. OPI comments specified in the EPS files are included in the PDF file so high-resolution images are added back into the file before going to press. The (small) PDF file is then transmitted to the printer, reducing the time and effort it takes to transfer. When the PDF file is received at the printer, initial preflight is streamlined because all of the components are in one package and viewable on-screen. The document is output to a PostScript language file. The file maintains the print controls specified in the authorizing application. The file

is then routed through a prepress workflow. A high-resolution image that remained at the printer is replaced in the file. The document is then output to final film, plate or paper. *Id.* p 313-314; Ex. 1109.

Thus as illustrated below, Zilles anticipates claim 10 because it discloses all of the claim limitations.

Claim	Zilles (Ex. 1109)
10. A method of providing printing and publishing services to a remote client in real time using a communication network, the method comprising:	p 308, 309
storing files on a computer server, the files containing information relating to images, text, art, and data; providing said files to a remote client for the designing of a page layout;	p 311
generating a portable document format (PDF) file from the designed page layout;	p 312, 313
generating a plate-ready file from said PDF file; and providing said plate-ready file to a remote printer.	p 313, 314

2. Claim 10 is Obvious over Lucivero et al. in view of Andersson et al. Under 35 U.S.C. §103(a)

As discussed above, *supra* Section VII (A) (2), Lucivero et al. discloses a system for the inputting, tracking, processing, queuing, storing, editing and printing of raster or bit map data. A method provides for a nearly continuous output of raster images to a plurality of output devices, such as, imagesetters,

platemakers, on-press imagers, digital proofers, digital color printers and the like. Lucivero et al. col. 1: 16-25; Ex. 1105. The prepress system operates within a standard network environment. For example, the system includes RIPs configured to output compressed raster data over a standard network interface. *Id.* at col. 5: 41-45; Ex. 1105.

As shown in Figure 2 of Lucivero et al., a prepress system 32 includes a plurality of RIPs 34 connected to network 35. The network 35 may include one or more front-ends 40, one or more print driver 41, one or more servers 42 for storing image and other data files, a proofer 43 or other output device 44. Another computer system 45 may be used for system administration. The network connected components listed above and other network connected components may be local or remote to the print drivers 41. The print drivers 41 may also be local or remote with respect to each other. *Id.* at col. 8: 29-40; Ex. 1105. An output device is selected from the group consisting of a printer, an imagesetter, a platemaker, a digital proofer, a storage device and a raster image processor. *Id.* at col. 7: 60-63; col. 8: 30-35; Ex. 1105.

Lucivero et al. further discloses that front-end 6 is used for creating, editing or preparing image data for printing halftone, black and white or color printing by an imagesetter or a platesetter for eventual image reproduction by a printing press

using a printing plate. *Id.* at col. 7: 56-67, col. 8: 1-2; Ex. 1105.

Further, the front-end 6 interfaces with a network connected to two raster image processors 10, 12 (RIPs). The RIPs 10 and 12 receive image data from the front-end over a network serial data transfer interface 8. The data typically is in the form of a page description language, e.g. A PostScript or PDF or other object orient text representation of the image to be printed. *Id.* at col. 7: 63-67, col. 8: 1-2; Ex. 1105.

Andersson et al. as discussed above, *supra* Section VII(A)(1) (and incorporated by reference herein) is relevant for reference to metaphors for printing and publishing workflows, such as "the market of one", "just in time printing and publishing", "mass-customization of media", "on-demand", and "1-to-1 communications". Further, Andersson indicates that the business of printing and publishing wants to be real time, with zero lag time between identification and fulfillment of need. Andersson et al. p 178-179; Ex. 1104.

In addition Andersson et al. discloses that Adobe's NetWorks System improves ease of use, ease of connection and ease of printer management all in one environment through Adobe PostScript Level 3. A printer with Networks functionality will include a print based Web page, Web-based printer management,

and printing directly from the printer's Web page. *Id.* at p 13; Ex. 1104.

In addition, Andersson et al. discloses converting a PostScript file to a PDF file and thereafter generating a plate-ready file from the PDF file to produce a plate. Andersson et al. p 43; Ex. 1104.

It would be obvious to one of ordinary skill in the art to combine the teachings of Lucivero et al. and Andersson et al. directed to computer-to-plate technology because both references disclose a digital network for generating file to plate output.

Thus, as illustrated below all the limitations of claim 10 are disclosed by Lucivero et al. in view of Andersson et al.

<b>Claim</b>	<b>Lucivero et al. (Ex. 1105) in view of Andersson et al. (Ex. 1104)</b>
10. A method of providing printing and publishing services to a remote client in real time using a communication network, the method comprising:	Lucivero et al., col. 1: 16-25; col. 5: 41-45. Andersson et al., p 178, 179.
storing files on a computer server, the files containing information relating to images, text, art, and data; providing said files to a remote client for the designing of a page layout;	Lucivero et al., col. 8: 29-40; col. 7: 60-63; col. 8: 30-35.
generating a portable document format (PDF) file from the designed page layout;	Lucivero et al., col. 7: 56-67; col. 8: 1-2; Andersson et al., p 13.
generating a plate-ready file from said PDF file; and providing said plate-ready file to a remote printer.	Lucivero et al., col. 7: 63-67; col. 8: 1-2. Andersson et al, p 43.

3. Claim 10 is Obvious over Benson ('818) in view of Buckley Under 35 U.S.C. §103(a)

Benson ('818) (Ex. 1112) relates to methods and systems for imposing and rendering image data for a surface to be printed by a printing device. Benson indicates that the system has particular applicability to printing presses, imagesetters, plate setters, digital presses and the like. As shown in Figure 1, files stored on a computer 12 have a content defined by a job ticket. The job ticket specifies the data to be displayed in the output. The input files include layout instructions that provide for page sizing, resource checking, file translation, on-screen viewing and job ticket generation. The layout information comes from one or more users. A page description language file is used to generate a PDF file corresponding to the original layout file. The PDF file is sent to a printing press, plate setter, digital press or the like for generating the desired output. Benson ('818), col. 4: 34-65: Ex. 1112.

Buckley (Ex. 1108) is relevant for the disclosure of converting a desired document file into a PDF file. A RIP converts the PDF file into a device-dependent raster image for the target output device. The output device can be an imagesetter, direct to plate, direct to press, or a laser printer. Buckley, p 337; Ex. 1108.

It would be obvious to one of ordinary skill in the art to combine the teachings of Benson ('818) (Ex. 1112) and Buckley (Ex. 1108) directed to digital printing processes because both of the prior art references disclose the generation of output to a printing device by converting an output layout to a PDF file which is used to generate a plate-ready file.

Thus as illustrated below, all of the limitations of claim 10 are disclosed by Benson in view of Buckley.

Claim	Benson (Ex. 1112) in view of Buckley (Ex. 1008)
10. A method of providing printing and publishing services to a remote client in real time using a communication network, the method comprising:	Benson, col. 5: 10-14.
storing files on a computer server, the files containing information relating to images, text, art, and data; providing said files to a remote client for the designing of a page layout;	Benson, col. 5: 4-9, col. 6: 54-60, 61-67; col. 7: 1-3.
generating a portable document format (PDF) file from the designed page layout;	Benson, col. 2: 6-11. Buckley, p. 337.
generating a plate-ready file from said PDF file; and providing said plate-ready file to a remote printer.	Benson, col. 2: 24-29; col. 4: 39-65. Buckley, p 337.

**C. Independent Claim 16 is Not Patentable**

Claim 16 is Obvious Over Lucivero et al. in view of Andersson et al., Sands et al. and Zilles Under 35 U.S.C. §103(a)

Lucivero et al., as discussed above *supra* at Section VII(A) (2) is directed to an imagesetting and electronic prepress system for inputting, tracking, processing, queuing, storing, editing and

printing of raster or bit map data. A method is disclosed for providing a nearly continuous output of raster images to a plurality of output devices, such as, imagesetters, platemakers, on-press imagers, digital proofers, digital color printers, and the like. Lucivero et al. col. 1: 16-25; Ex. 1105.

As further disclosed in Lucivero et al., input image files are received by networked RIPs 34 from the front-end 40. Each RIP 34 on the network 35 can be accessed by any front-end 40 or by the server 42 or other computer system 45, any of which may be either local or remote. *Id.* at col. 8: 60-67; col. 9: 1-4; Ex. 1105.

Figures 32 and 33 of Lucivero et al. show how detailed information about the content of the job, including page, separation, and a thumbnail sketch of the job is provided. The first time that a thumbnail is requested, the PrintDrive server compiles a Low Resolution representation of High Resolution data stored for each separation. The thumbnails may be viewed as separations or as a Low Resolution color composite of the image job.

Insofar as producing a plate-ready file, Lucivero et al. discloses that the front-end 6 is for creating editing or otherwise preparing image data for printing, especially for halftone, black and white or color printing. The output from the front-end becomes output by an imagesetter or a platesetter for image reproduction by a printing press using a printing plate. The front-end 6



interfaces with a network 8 which is connected to two raster image processers 10, 12 (RIPs). The RIPs 10 and 12 receive image data from the front-end 6 over a network serial data transfer interface 8. Such image data is typically in the form of a page description language e.g. a Postscript or PDF or other, object orient text representation of the image to be printed. *Id.* at col. 21: 58-67; col. 8: 1-2; Ex. 1105.

Andersson et al. is relevant for the disclosure that font embedding adds size to a document; however it provides an important aspect of document portability-cross-platform font fidelity and the ability to printout at any resolution. This means that the receiver of the digital page could have a high resolution color printer and print out pages as needed at a remote location. Pages could be created in one part of the world and then sent to a printer in the opposite hemisphere who uses the data to make a high resolution document.

As discussed above regarding the relevance of Sands et al. (Ex. 1107) *supra* Section VII(A)(3), Sands et al. discloses a digital data imaging (DPI) system for receiving customer transmitted technical document files produced on a desktop publishing package. The DPI system includes a work station, modem and related telecommunication link, a photo typesetter and a software for automatically imposing flats for printing on the typesetter. Sands et al., col. 4: 58-67; col. 5: 1-4; Ex. 1107.

A typesetter provides high-resolution options in a range of 635 dots per inch through 1,270 to 2,540. Press film is developed using a developer 54 which prints out press film flats ready for plate making and printing. *Id.* at col. 5: 16-22; col. 5: 56-64; Ex. 1107. An imposition module 114 uses data from verification and form breakup programs to impose incoming pages into a large page description language file. This file is used to generate the film output to create offset plates or used to drive a plate-to-plate device. *Id.* at col. 7: 63-67; col. 8: 1-7; Ex. 1107.

Zilles (Ex. 1109) is relevant for the disclosure in the use of PDF for document delivery by a graphic designer creating a design for a brochure. The designer obtains the images needed in photographic form and sends them to a printer for scanning and storage of the high resolution images. Zilles, p 313; Ex. 1109. The printer return Encapsulated PostScript (EPS) files with FPO (for placement only) images and OPI comments describing the high resolution files. The graphic designer creates a document in a page layout program, includes the FPO images received from the printer, and then outputs the document to a PDF file. OPI comments specified in the EPS files are included in the PDF file so high-resolution images can be added back into the file before going to press. The (small) PDF file is then transmitted to the printer, reducing the time and effort it takes to transfer. High-resolution images that remained at the printer are placed in the document.

The document is output to final film, plate or paper. *Id.* p 313-314; Ex. 1109.

Andersson et al. (Ex. 1104) discloses the use of Acrobat Distiller to convert a PostScript file into the Portable Document Format (PDF). This allows distilling a file containing complex information, such as high-resolution images. The distilled (low resolution) file is available for viewing, navigating, proofing and printing. Andersson et al., p 97-98; Ex. 1104.

It would be obvious to one of ordinary skill in the art to combine the teachings of Lucivero et al. (Ex. 1105) and Sands et al. (Ex. 1107) directed to digital page imaging systems with the use of an open prepress interface (OPI) operations disclosed in Zilles (Ex. 1109) because all the prior art disclose processes utilized in imaging and electronic prepress systems and methods for enhancing system work flow in computer-to-plate technology.

As illustrated below, all the limitations of claim 16 are obvious based on the combination of Lucivero et al. in view of Sands et al., Andersson et al. and Zilles.

Claim	Lucivero et al. (Ex. 1105), in view of Sands et al. (Ex. 1107), Andersson et al. (Ex. 1104), and Zilles (Ex. 1109)
16. A method of providing printing and publishing services to a remote client performing any one of page layout designing and plate press printing where said printing and	Lucivero et al., col. 1: 16-25; col. 8: 60-67. Sands et al. col. 4: 58-67 col. 5: 1-4.

publishing services are provided in real time using a wide area communication network, the method comprising:	Lucivero et al., col. 9: 1-4.
storing high resolution files on a computer server;	Lucivero et al., col. 21: 53-63. Sands et al., col. 5: 16-22. Zilles, p 313.
generating low resolution files corresponding to said high resolution files;	Sands et al. col. 5: 16-22. Andersson et al., p 20.
providing said low resolution files to a remote client for the designing of a page layout;	Zilles p 313-314. Sands et al., col. 5: 32-48. Andersson et al., p 20.
generating a portable document format (PDF) file from the page layout designed by said remote client;	Sands et al., col. 5: 56-64.
providing said PDF file to said remote client; and providing a plate-ready file to a remote printer	Sands et al. col. 7: 63-67; col. 8: 1-7.

**D. The Dependent Claims Recite Additional Features that are Not Patentable.**

**1. Dependent Claim 2 Recites End User Facility as Comprising a Communication Routing Device Coupling the End User Facility to the Communication Network, Which is Anticipated and Obvious**

Claim 2 depends from claim 1, which was discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 2 recites the end user facility further comprises a communication routing device coupling the end user facility to the communication network, a computer which performs page building operations, and a proofer which provides printed samples of pages.

Lucivero et al. discloses a Front End user 6 connected by a computer in a network through raster image processors 10, 12 and a multiplexor 14 to an output device 4, such as an imagesetter or platesetter for image reproduction by a printing press using a printing plate. Lucivero et al., col. 7: 56-67; col. 8: 1-2. See also col. 5: 11-17; col. 6: 26-37; Ex. 1105.

Lucivero et al. discloses an electronic proofing system that employs a remote software multiplexor in an electronic proofing system. Id. at col. 8: 43-49; col. 13: 38-44. See also 63-64; Ex. 1105.

Claim 2 is obvious over Lucivero et al. in combination with the same references applied to claim 1 and further in view of the above-discussed references in Lucivero et al.

**2. Dependent Claim 3 Recites the Routing Device Connected to an Asynchronous Transfer Mode (ATM) Switch, Which is Anticipated and Obvious.**

Claim 3 depends from claim 1, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 3 recites "wherein the routing device is connected to an asynchronous transfer mode (ATM) switch." Claim 3 is further obvious over Holub (Ex. 1110).

Holub is relevant for the disclosure of a system 100 for controlling and distributing color reproduction in a

telecommunications network 11 for linking data flow between modes. Communication in the system can be performed in accordance with protocols for switched linkages, including asynchronous transfer mode. Holub, col. 13: 36-44; Ex. 1110.

Thus, claim 3 is obvious over Holub in combination with the same references applied to claim 1 and further in view of the above-discussed disclosures in Holub.

**3. Dependent Claim 4 Recites the Printing Company Facility as Comprising a Communication Routing Device Coupling the Printing Company Facility to the Communication Network, Which is Anticipated and Obvious.**

Claim 4 depends from claim 1, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 4 recites "wherein the printing company facility further comprises a communication routing device coupling the printing company facility to the communication network, a computer which performs imposition operations, and a platesetter which exposes a printing plate."

Regarding the above limitations directed to imposition operations and a platesetter which exposes a printing plate. See the above discussion of Sands et al. *supra* at VII(A)(2), which is incorporated by reference herein. See also Sands et al. col. 1: 54-63; col. 7: 63-65; col. 8: 1-7; Ex. 1107. Lucivero et al., col. 7: 58-63; col. 8: 41-49; Ex. 1105.

Thus, claim 4 is obvious over Sands et al. and Lucivero et al. in combination with the same references applied to claim 1 and further in view of the above-discussed disclosures in Sands et al. and Lucivero et al.

**4. Dependent Claim 5 Recites the Step of the Central Service Facility Further Comprising a Communication Routing Device Coupling the Central Service Facility to the Communication Network, Which is Anticipated and Obvious.**

Claim 5 depends from claim 1, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 5 further limits claim 1 by reciting "the central service facility further comprises a communication routing device coupling the central service facility to the communication network, a server which performs content management operations, and storage devices which contain electronic files."

Andersson et al. discloses the above limitations recited in claim 5, specifically in a printing and publishing system an OPI server for content management and image and network servers for storing electronic files. Andersson et al., p 59-65; Ex. 1104.

Thus, claim 5 is obvious over Andersson et al. in combination with the same references applied to claim 1 and further in view of the above-discussed disclosures in Andersson et al.

**5. Dependent Claim 6 Recites the Central Service Facility Further Comprising a Network Including Fast Ethernet and Communication Ports, Which is Anticipated and Obvious.**

Claim 6 depends from claim 1, which was discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 6 recites "wherein the central service facility further comprises a network including fast Ethernet and communication ports."

Lucivero et al. and Andersson et al. disclose the above limitations directed to a "fast Ethernet". See Lucivero et al. col. 6: 1-3; Ex. 1105 and Andersson et al., p 46-47; Ex. 1104.

Thus, claim 6 is obvious over Lucivero et al. and Andersson et al. in combination with the same references applied to claim 1 and further in view of the above-discussed disclosures in Lucivero et al. and Andersson et al.

**6. Dependent Claim 7 Recites the Communication Network Includes Any One Of Data Packets Associated With a Packet Switched Network and Data Cells, Which is Anticipated and Obvious.**

Claim 7 depends from claim 1, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 7 further limits claim by reciting "the communication network includes any one of data packets associated with a packet



switched network and data cells associated with a cell switched network."

As discussed above with respect to dependent claim 3 Holub (Ex. 1110) discloses use of an asynchronous transfer mode network (ATM). It is well known in the art that an ATM is a high speed cell switching network for LANS and WANS that handles data and real time voice and video in cell switched networks. Holub, col. 13: 36-44; Ex. 1110.

Thus, claim 7 is obvious over Holub in combination with the same references applied to claim 1 and further in view of the above-discussed disclosures in Holub.

**7. Dependent claim 8 recites the cell switched network comprises an asynchronous transfer mode (ATM) network which is anticipated and obvious.**

Claim 8 depends from claim 7, which in turn depends from claim 1, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art relating to claims 1 and 7.

Claim 8 recites "the cell switched network comprises an asynchronous transfer mode (ATM) network."

For the reasons discussed above with respect to dependent claim 7, Holub (ex. 1110) discloses this limitation of claim 8. See Holub, col. 13: 36-44; Ex. 1110.

Thus, claim 8 is obvious over Holub in combination with the same references applied to claim 1 and dependent claim 7 and further in view of the above-discussed disclosures in Holub.

**8. Dependent Claim 9 Recites the Central Service Facility are Remotely Located From the End User Facility, Which is Anticipated and Obvious.**

Claim 9 depends from claim 1, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 9 recites "the central service facility are remotely located from the end user facility and printing customer facility."

The above limitation recited by claim 9 is disclosed in Lucivero et al. col. 8: 28-39; Ex. 1105.

Thus, claim 9 is obvious over Lucivero et al. in combination with the same references applied to claim 1 and further in view of the above-discussed disclosures in Lucivero et al.

**9. Dependent Claim 11 Recites Providing Said PDF File to Said Remote Client For Proofing and Revision of the Page Layout, Which is Anticipated and Obvious.**

Dependent claim 11 depends from claim 10, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 11 recites "providing said PDF file to said remote client for proofing and revision of the page layout."

Dorfman (Ex. 1111) discloses a proofing system utilizing dynamic PDF technology. A user accesses through an Internet connection the PDF file to be viewed on a local low resolution printer for final proofing. Dorfman, p 3, lines 1-13: Ex. 1111.

Thus, claim 11 is obvious over Dorfman in combination with the same references applied to claim 10 and further in view of the above-discussed disclosures in Dorfman.

**10. Dependent Claim 12 Recites the Step of Providing Said Plate-Ready File to a Remote Printer Comprises Communicating Said Plate-Ready File to Said Remote Printer Via a Communication Network, Which is Anticipated and Obvious.**

Dependent claim 12 depends from claim 10, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 12 recites "the step of providing said PDF file to said plate-ready file to a remote printer comprises communicating said plate-ready file to said remote printer via a communication network."

Zilles discloses a graphic designer creating a document in a page layout. The document is outputted to a PDF file. The PDF file is transmitted to a printer where the high-resolution images are replaced in the document. The document is output to final film, plate or paper. Zilles, p 313-314; Ex. 1109.

Thus, claim 12 is obvious over Zilles in combination with the same references applied to claim 10 and further in view of the above-discussed disclosures in Zilles.

**11. Dependent Claim 13 Recites the Step of Providing the Files to a Remote Client for Designing of a Page Layout, Which is Anticipated and Obvious.**

Claim 13 depends from claim 10, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 13 further limits claim 10 by reciting "the step of providing said files to a remote client for the designing of a page layout comprises providing access to a database containing said files over a communication network."

Benson et al. discloses printing presses controlled by a computer for on-press imaging where the press computer accepts jobs in digital form. Layout and image processing are performed by a prepress system. Benson et al. col. 1: 44-56; Ex. 1106. Then when it is time to create an output device the PDF file is converted.

Thus, claim 13 is obvious over Benson et al. in combination with the same references applied to claim 10 and further in view of the above-discussed disclosures in Benson et al.

**12. Dependent Claim 14 Recites the Step of Generating a Plate-Ready File From the PDF File, Which is Anticipated and Obvious.**

Claim 14 depends from claim 10, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 14 further limits claim 10 by reciting "the step of generating a plate-ready file from said PDF file comprises converting said PDF file to a PostScript file."

Andersson et al. discloses the well-known process of converting any PostScript file to PDF using Acrobat Distiller. The PDF file can then be distributed as a plate ready file to an imagesetter or platesetter. Andersson et al., p 25-29, 43 and 77; Ex. 1104. Then when it is time to create an output device, the PDF file is converted to a PostScript file. *Id.* at p 26; Ex. 1104. The file is then ready to print. *Id.* at 6, 15, 16, Ex. 1104.

Thus, claim 14 is obvious over Andersson et al. in combination with the same references applied to claim 10 and further in view of the above-discussed disclosures in Andersson et al.

**13. Dependent Claim 15 Recites the Step Of Storing Files On A Computer Server, Which is Anticipated and Obvious.**

Claim 15 depends from claim 10, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 15 further limits claim 10 by reciting "the step of storing files on a computer server comprises logging the files into a content management database."

Dorfman et al. (Ex. 1111), as discussed above, discloses a front end 2 using an Internet browser to access a database at a remote location. In one example, Dorfman et al. describes a commercial printer establishing a web site on the Internet which allows customers password protected access via a computer system that operates as a server to the services and products of the commercial printer. A customer seeking to design custom printed materials would then access the web page of the commercial printer and enter an area reserved for services and products offered by the printer. Dorfman et al., p 2; Ex. 1111.

Thus, claim 15 is obvious over Dorfman et al. in combination with the same references applied to claim 10 and further in view of the above-discussed disclosures in Dorman et al.

**14. Dependent Claim 17 Recites the Low Resolution Files are Stored In a Storage Device, Which is Anticipated and Obvious.**

Claim 17 depends from claim 16, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 17 further limits claim 16 by reciting "the low resolution files are stored in a storage device at said remote client."

Dorfman (Ex. 1111) and Adams II (Ex. 1114) disclose the storage of low resolution images in a memory 4 at a location remote

form the user. Dorfman et al., p 3; Ex. 1111. Adams II, p 116; Ex. 1114.

Thus, claim 17 is obvious over Dorfman et al. in combination with the same references applied to claim 16 and further in view of the above-discussed disclosures in Dorfman et al.

**15. Dependent Claim 18 Recites the Step Of Generating a Portable Document Format File From the Page Layout Designed By the Remote Client, Which is Anticipated and Obvious.**

---

Claim 18 depends from claim 16, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 18 further limits claim 16 by reciting "the step of generating a portable document format (PDF) file from the page layout designed by said remote client comprises receiving a PostScript file from said remote client via the communication network and swapping said low resolution files used in said page layout with said high resolution files."

Aldus (Ex. 1113) discloses that open press interface (OPI) allows a page-layout program to use low resolution images for layout and proofing. The OPI server automatically substitutes a high resolution TIFF or other image for the low resolution image when the final film or plates are generated. Aldus, p 5. col:1; Ex. 1113.

Thus, claim 18 is obvious over Aldus in combination with the same references applied to claim 16 and further in view of the above-discussed disclosures in Aldus.

**16. Dependent Claim 19 Recites the Step Of Providing a Plate-Ready File to a Remote Printer, Which is Anticipated and Obvious.**

Claim 19 depends from claim 16, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 19 further limits claim 16 by reciting "the step of providing a plate-ready file to a remote printer comprises converting the format of the PDF file to a plate-ready file format and communicating the plate-ready file to the remote printer via the communication link."

Sands et al. discloses a digital page imaging (DPI) system by which customers produce PostScript files containing information for the setup of a press job. The PostScript file corresponds to a film flat. The film flat is spooled to a typesetter which images the flats on paper or film. The film is used to produce offset plates used to run the job on a press. Sands et al., col: 33-64; Ex. 1107.

Thus, claim 19 is obvious over Sands et al. in combination with the same references applied to claim 16 and further in view of the above-discussed disclosures in Sands et al.



17. Dependent Claim 20 Recites the Step Of Storing Files  
On a Computer Server, Which is Anticipated and Obvious.

Claim 20 depends from claim 16, which as discussed above *supra* (and incorporated by reference herein) is not patentable in view of the previously discussed prior art.

Claim 20 further limits claim 16 by reciting "the step of storing files on a computer server comprises logging said files into a content management database according to user profiles and attributes."

Andersson et al. discloses a number of servers that contain files shared by client workstations on a network. Every network has a server. In the case of a Network Server centralized files are shared by clients. In the case of a Database Server large volumes of images and data files are stored for searching and retrieving the stored data. Andersson et al., p 59-62; Ex. 1104.

Thus, claim 20 is obvious over Andersson et al. in combination with the same references applied to claim 16 and further in view of the above-discussed disclosures in Andersson et al.

VIII. CONCLUSION

For the foregoing reasons, petitioner respectfully requests the grant of *inter partes* review of all claims 1-20 of the '155 patent and cancellation of all claims 1-20 of the '155 patent.

Dated: August 2, 2013

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

Pursuant to 37 C.F.R. §42.105, I certify that I caused a true and correct copy of the Petition for *Inter Partes* Review of Claims 1-20 of U.S. Patent No. 6,738,155 and supporting evidence to be served via First Class, U.S. Mail on the following:

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Dated: August 2, 2013

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**APPENDIX A**

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

**APPENDIX B**

Pending Litigation Involving U.S. Patent No. 6,738,155

13-cv-00484 (EDTex) CTP Innovations, LLC v. Integracolor Filed: 6/14/13

13-cv-00485 (EDTex) CTP Innovations, LLC v. Performance Companies, LP Filed: 6/14/13

13-cv-00486 (EDTex) CTP Innovations, LLC v. Best Press, Inc. Filed: 6/14/13

13-cv-00487 (EDTex) CTP Innovations, LLC v. Ovation Graphics, LLC Filed: 6/14/13  
F.L. Motheral Printing Co.

13-cv-00488 (EDTex) CTP Innovations, LLC v. Nieman Printing Filed: 6/14/13

13-cv-00489 (EDTex) CTP Innovations, LLC v. TST/Impreso, Inc. Filed: 6/14/13

13-cv-00490 (EDTex) CTP Innovations, LLC v. Imagine! Print Solutions, Inc. Filed: 6/14/13

13-cv-00491 (EDTex) CTP Innovations, LLC v. Blanks Printing & Imaging, Inc. Filed: 6/14/13

13-cv-00492 (EDTex) CTP Innovations, LLC v. PrintPlace.com Filed: 6/14/13

13-cv-00493 (EDTex) CTP Innovations, LLC v. Etheridge Printing Filed: 6/14/13

13-cv-00494 (EDTex) CTP Innovations, LLC v. Outlook Group Corp. Filed: 6/14/13

13-cv-00495 (EDTex) CTP Innovations, LLC v. O'Neil Data Systems, Inc. Filed: 6/14/13

13-cv-00496 (EDTex) CTP Innovations, LLC v. Cockrell Enovation, Inc. Filed: 6/14/13  
Cockrell Printing Co.

13-cv-00581 (MDTenn) CTP Innovations, LLC v. Ambrose Printing Company Filed: 6/14/13

13-cv-00582 (MDTenn) CTP Innovations, LLC v. American Printing Company, Inc. Filed: 6/14/13

13-cv-00583 (MDTenn) CTP Innovations, LLC v. MPI Label Systems Filed: 6/14/13

13-cv-00584 (MDTenn) CTP Innovations, LLC v. Textile Printing Company Filed: 6/14/13

13-cv-00585 (MDTenn) CTP Innovations, LLC v. Jet Printing, LLC Filed: 6/14/13

13-cv-00586 (MDTenn) CTP Innovations, LLC v. Walsworth Publishing Company, Inc. Filed: 6/14/13

13-cv-00601 (MDTenn) CTP Innovations, LLC v. Dickinson Press Inc. Filed: 6/18/13

13-cv-01183 (WDTenn) CTP Innovations, LLC v. Edward Brothers, Inc. Filed: 6/14/13

13-cv-01184 (WDTenn) CTP Innovations, LLC v. Malloy Incorporated Filed: 6/14/13

13-cv-02421 (WDTenn) CTP Innovations, LLC v. A & M Label Filed: 6/14/13

13-cv-02422 (WDTenn) CTP Innovations, LLC v. Magna IV Color Filed: 6/14/13  
Imaging, Inc.

13-cv-02425 (WDTenn) CTP Innovations, LLC v. Dexter Hospitality Filed: 6/14/13

13-cv-02166 (NDGA) CTP Innovations, LLC v. Benson Integrated Filed: 6/28/13  
Marketing Solutions

13-cv-02167 (NDGA) CTP Innovations, LLC v. DATAMATX, Incorporated Filed: 6/28/13

13-cv-02168 (NDGA) CTP Innovations, LLC v. The Meyers Printing Filed: 6/28/13  
Companies, Inc.

13-cv-02169 (NDGA) CTP Innovations, LLC v. Primary Color Systems Filed: 6/28/13  
Corporation

13-cv-02170 (NDGA) CTP Innovations, LLC v. Progress Printing Company Filed: 6/28/13

13-cv-02171 (NDGA) CTP Innovations, LLC v. Rohrer Corporation Filed: 6/28/13

13-cv-02172 (NDGA) CTP Innovations, LLC v. SleeveCo, Inc. Filed: 6/28/13

13-cv-02173 (NDGA) CTP Innovations, LLC v. Tucker-Castleberry Filed: 6/28/13  
Printing, Inc.

13-cv-02174 (NDGA) CTP Innovations, LLC v. Walton Press, Inc. Filed: 6/28/13

13-cv-2222 (NDTEX) Taylor Publishing Company v. CTP Innovations, LLC Filed: 6/13/13

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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

Filed: July 30, 1999                      Issued: May 18, 2004

Title:        SYSTEM AND METHOD OF PROVIDING PUBLISHING  
              AND PRINTING SERVICES VIA A COMMUNICATIONS  
              NETWORK

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**POWER OF ATTORNEY**

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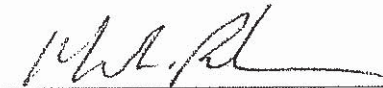
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For: Printing Industries of America



Mark Bohan  
Vice President, Technology  
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Dated: 07/26/13