

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VMWARE, INC., INTERNATIONAL
BUSINESS MACHINES CORPORATION
AND
ORACLE AMERICA, INC.,
Petitioners,

v.

ELECTRONICS AND TELECOMMUNICATIONS RESEARCH
INSTITUTE,
Patent Owner.

Case IPR2014-00949
Case IPR2014-00901
Patent No. 6,978,346 B2

**PATENT OWNER'S RESPONSE
TO PETITION FOR *INTER PARTES* REVIEW**

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