

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTERNATIONAL BUSINESS MACHINES CORPORATION and
ORACLE AMERICA, INC.
Petitioners

v.

ELECTRONICS AND TELECOMMUNICATIONS RESEARCH INSTITUTE
Patent Owner

Case No. IPR2014-00976
Patent No. 6,978,346

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

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