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## SONY CORPORATION Petitioner v.

INNOVATIVE COMMUNICATIONS TECHNOLOGIES, INC. (now STRAIGHT PATH IP GROUP, INC.)

Patent Owner

Patent No. 6,108,704

Filing Date: September 25, 1995

Issue Date: August 22, 2000

Title: POINT-TO-POINT INTERNET PROTOCOL

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Inter Partes Review No. IPR2014-00230, Filing Date December 5, 2013

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



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I.	PETITIONER'S PROPOSED CLAIM CONSTRUCTIONS ARE UNSUPPORTED AND CONTRADICTED BY THE CLEAR DISCLOSURES OF THE '704 PATENT					
	A.	Each Challenged Claim Requires a Query into the On-Line Status of a Second Process, Rather than a Query into Whether a Process Has Registered with a Server				
		1. Petitioner's Suggestion That "Or "Registered with a Server" Has I Specification	No Basis in the Claims or			
		2. Petitioner's Alternative Construction No Basis in the Claims or Specification.				
	B. Petitioner's Construction for "A Network Protocol Address Received [] Following Connection to the Computer Network" Eliminates Claim 1's Dynamic Addressing Requirement					
II.	PETITIONER HAS FAILED TO DEMONSTRATE THAT EACH LIMITATION OF THE CHALLENGED CLAIMS IS FOUND IN THE ASSERTED PRIOR ART					
	A.	The Challenged Claims Require a Quer and Are Therefore Patentable over the	Microsoft Manual,			



	1.	The Microsoft Manual Does Not Teach a Query into On- Line Status of a Process and Therefore Does Not Anticipate Claim 1					
	2.	The Microsoft Manual in Combination with Either Palmer or Pinard Does Not Teach a Query into On-Line Status of a Process and Therefore Does Not Render Obvious Claims 11-12, 19, 22-23, or 30					
В.	The Claims Require a Query into On-Line Status or Dynamic Addressing, and are Therefore Patentable over VocalChat, Alone or in Combination with Pinard or RFC 1541						
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C.	Little-1994 in Combination with RFC 791, RFC 1541, Little-1993, or Pinard Does Not Teach the Required Point-to-Point Communication with a Second Process						
	1.	Petitioner Has Admitted that Little-1994 Should Not Be Considered by the Board					
	2.	Conr	Asserted References Do Not Teach the Required nection Between Two Processes, Receiving the york Protocol Address of the Second Process, or				



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