

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY COMPUTER ENTERTAINMENT AMERICA LLC
Petitioner

v.

APLIX IP HOLDINGS CORPORATION
Patent Owner

Case No. IPR2015-00229

Patent No. 7,667,692

**PATENT OWNER APLIX IP HOLDINGS CORPORATION'S
PRELIMINARY RESPONSE**

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
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EXHIBIT LIST

EXHIBITS FILED BY SONY COMPUTER ENTERTAINMENT AMERICA LLC (SELECTED)	
Exhibit 1001	U.S. Patent 7,667,692
Exhibit 1008	Expert Declaration of Dr. Gregory Francis Welch

EXHIBITS FILED BY APLIX IP HOLDINGS CORPORATION	
Exhibit 2001	Amended Complaint in <i>Aplix IP Holdings Corporation v. Sony Computer Entertainment Inc. and Sony Computer Entertainment America LLC</i> , Case No. 1:14-cv-12745.

I. INTRODUCTION

Patent Owner Aplix IP Holdings Corporation (“Aplix”) submits this preliminary response, under 37 C.F.R. § 42.107, to Petitioner Sony Computer Entertainment America LLC’s (“SCEA’s”) petition for *inter partes* review.

SCEA has failed to meet its burden of demonstrating that trial is required on each of several the grounds it raises per claim. In fact, for multiple proposed grounds, SCEA fails to support its assertions with any reference to the cited prior art. Aplix respectfully suggests that the Board should not institute a review of the many redundant and unsupported grounds offered in the petition and via the expert declaration submitted with the petition. Finally, and in the alternative, to the extent that the Board institutes any review of U.S. Patent No. 7,667,692 (“the ’692 patent”) it should reject the petition’s proposed claim construction.

II. OVERVIEW OF THE ’692 PATENT

Beginning in 2003, a group of Massachusetts inventors led by Dr. Beth Marcus, developed interactive-design technologies for improving data entry, control, and game-play on hand-held devices and host devices.¹

¹ Ex. 2001 at ¶ 2.

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