

Filed on Behalf of NETWORK-1 TECHNOLOGIES, INC.

By: Charles R. Macedo (Reg. No. 32,781)
Brian A. Comack (Reg. No. 45,343)
Amster, Rothstein & Ebenstein LLP
90 Park Avenue
New York, NY 10016
Telephone: (212) 336-8074
Facsimile: (212) 336-8001
cmacedo@arelaw.com
N1-Google-IPR@arelaw.com

Gregory Dovel (admitted *pro hac vice*)
Dovel & Luner, LLP
201 Santa Monica Blvd., Suite 600
Santa Monica, CA 90401
Telephone: (310) 656-7066
greg@dovellaw.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.
Petitioner

v.

NETWORK-1 TECHNOLOGIES, INC.
Patent Owner

Case IPR2015-00345
Patent 8,205,237

PATENT OWNER'S RESPONSE PURSUANT TO 37 C.F.R. § 42.120

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Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756 (Aug. 14, 2012)	17, 49

Exhibit List

Exhibit Number	Description
2001	“Brute-force search”— http://en.wikipedia.org/wiki/Bruteforce_search (3/19/2015)
2002	U.S. Patent 8,447,762 (Brendel)
2003	U.S. Patent 7,167,984 (Graveman)
2004	Declaration of Greg Dovel in Support for <i>Pro Hac Vice</i> Admission
2005	Declaration of Dr. George Karypis
2006	Deposition of Dr. Pierre Moulin, dated August 19-20, 2015
2007	Modern Dictionary of Electronics 425-426 (1999).
2008	http://en.wikipedia.org/wiki/Nearest_neighbor_search#Approximate_nearest_neighbor
2009	http://en.wikipedia.org/wiki/Big_O_notation
2010	P. N. Yianilos, “Locally lifting the curse of Dimensionality for nearest Neighbor Search” SODA 2000: 361-370

Patent Owner Network-1 respectfully submits this response to the Petition as instituted by the decision to institute an *Inter Partes* Review of Patent No. 8,205,237 (the “237 patent”). IPR2015-00345, paper 6 (“Decision”).

Network-1 appreciates the guidance and concerns that the Board provided and raised in the Decision. In this Response, Network-1 addresses the Board's specific concerns. In doing so, Network-1 provides an extensive and detailed technical analysis in the accompanying Declaration of expert Dr. George Karypis (ex. 2005, “Karypis Decl.”) that it was not permitted to submit along with its prior filings.¹

In addition, Network-1 quotes dozens of admissions from the deposition of Petitioner's own Declarant, Dr. Pierre Moulin (ex. 2006), to corroborate most of the arguments made in this Response.

First, the Response addresses the claim constructions relevant to this IPR.

¹ To avoid duplication, to make the proceeding more efficient, and to avoid confusion (by citing multiple versions of Karypis Declarations), Patent Owner provides a single Karypis Declaration (ex. 2005) for the four related IPRs (IPR2015-00343, IPR2015-00345, IPR2015-00347, and IPR2015-00348). As a result, certain paragraphs of the Declaration (*e.g.*, ¶¶19-27, 38-44) are not directly relevant to this IPR.

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