UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC. Petitioner

v.

Patent of AT HOME BONDHOLDERS' LIQUIDATING TRUST Patent Owner

Case IPR2015-00660 U.S. Patent No. 6,286,045 Title: INFORMATION STORAGE AND DELIVERY OVER A COMPUTER NETWORK USING CENTRALIZED INTELLIGENCE TO MONITOR AND CONTROL THE INFORMATION BEING DELIVERED

PATENT OWNER'S PRELIMINARY RESPONSE UNDER 37 C.F.R. §§ 42.107

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	A.	Angles, Merriman, and HTTP1.0 do not disclose all of the elements of independent claims 49 and 64			
		 (i) Angles, Merriman, and HTTP1.0 do not disclose the claimed request signal that includes information to prevent the signal from being blocked due to caching19 			
		(ii) Angles, Merriman, and HTTP1.0 do not teach or suggest the use of two or more requests to retrieve a banner25			
	B.	A POSA would not modify Angles and Merriman in a way that results in the claimed invention			

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	C.	The Petition fails to demonstrate that dependent claims 51-53, 55-58, 65-67, and 70-71 are obvious	
V.	[GROUND 2] The Petition Fails To Show That Claims 50 and 69 Are Unpatentable Based On Angles (GOOG 1012), Merriman (GOOG 1013), HTTP1.0 (GOOG 1008), and Davis (GOOG 1014)		
VI.	[GROUND 3] The Petition Fails To Demonstrate That Claims 49-53 and 55-57 Are Unpatentable Based On Wexler (Ex. 1007) and HTTP 1.0 (Ex. 1008)		
	A.	Wexler and HTTP1.0 do not disclose all the elements of independent claim 49	
		(i) Neither Wexler nor HTTP 1.0 teach or suggest the use of two requests to retrieve a banner	
		 (ii) Neither Wexler nor HTTP1.0 teach or suggest "causing a first banner request signal to be transmitted from the device to a first server" of Claim 49	
	B.	A POSA would not modify Wexler and HTTP1.0 in a way that results in the claimed invention	
	C.	The Petition fails to demonstrate that dependent Claims 50-53 and 55-57 are obvious	
VII.	67, ai	UND 4] The Petition Fails To Demonstrate That Claims 58, 64- d 69-71 Are Unpatentable Based On Wexler (GOOG 1007), P1.0 (GOOG 1008), and Meeker (GOOG 1010)41	
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	B.	A POSA would not modify Wexler, HTTP1.0, and Meeker in a way that results in the claimed invention	
	C.	The Petition fails to demonstrate that dependent claims 58, 65- 67, and 69-71 are obvious	
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Table of Exhibits

AHBLT-(Exhibit #)	Description
AHBLT-2001	Jason Fry, Network Caching Catches Flak From Some Content Providers, WALL ST. J. (Nov. 21, 1997), http://www.wsj.com/articles/SB876847891653286000
AHBLT-2002	Seth Schiesel, Updates/Media and Technology; Software to Track Business Prospects By Web Visits, N.Y.TIMES (Oct. 6, 1997), http://www.nytimes.com/1997/10/06/business/updates- media-and-technology-software-to-track-business-prospects- by-web-visits.html
AHBLT-2003	Rick E. Bruner, Interactive: Media & Marketing: Matchlogic Service Solves Cache Problem, Advertising Age (Oct. 13, 1997), http://adage.com/article/news/interactive-media- marketing-matchlogic-service-solves-cache-problem/70523/
AHBLT-2004	What is ABC, Audit Bureau of Circulations, http://www.auditbureau.org/about-what-is-abc.html (last visited May 17, 2015)
AHBLT-2005	Tom Shields, Internet Advertising Banner Counting Methodology (Oct. 23, 1998), https://web.archive.org/web/19990819024111/http://www.net gravity.com/standards/WD-countmethod-19981023.html
AHBLT-2006	Interactive Audience Measurement and Advertising Campaign Reporting and Audit Guidelines, Interactive Advertising Bureau (Sep. 2004), http://www.iab.net/media/file/US_meas_guidelines.pdf
AHBLT-2007	CGI Programming Guide on the World Wide Web, Shishir Gundavaram, (1st Ed., March 1996), http://www.oreilly.com/openbook/cgi/

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AHBLT-2008	DART White Paper Counting Methodologies, DoubleClick, July 12, 2001
AHBLT-2009	W3C httpd CGI/1.1 Script Support, World Wide Web Consortium (W3C) (July 1995), http://www.w3.org/Daemon/User/CGI/Overview.html
AHBLT-2010	"conjunction" Merriam-Webster Online, http://www.merriam-webster.com/dictionary/conjunction (last visited May 17, 2015)
AHBLT-2011	HTML 4.0 Specification, Dave Raggett et. al. eds. (Dec. 1997), World Wide Web Consortium (W3C), http://www.w3.org/TR/REC-html40-971218/
AHBLT-2012	We've officially acquired DoubleClick, Official Google Blog (Mar. 11, 2008), http://googleblog.blogspot.com/2008/03/weve-officially- acquired-doubleclick.html
AHBLT-2013	Duane Wessels, Web Caching, O'Reilly & Associates, Inc. (June 2001)

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