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 IPR2015-00662 ¹ U.S. Patent No. 6,014,698 Title: SYSTEM USING FIRST BANNER REQUEST THAT CAN NOT BE BLOCKED FROM REACHING A SERVER FOR ACCURATELY COUNTING DISPLAYS OF BANNERS ON NETWORK TERMINALS

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



¹ Case IPR2015-00666 has been consolidated with this proceeding.

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	A.	The combination of Angles, Merriman, and HTTP1.0 teaches that the substituted Merriman redirect would cause a request that would not be blocked by a cache		
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	C.	The Angles advertisement request would be blockable by a cache if it was a GET request (698 claims 1, 17, 30, 39, 44)21			
	D.	The combination of Angles, Merriman, and HTTP1.0 does not teach a URL that includes "cgi-bin" and "?" (698 claims 1, 17, 30, 39, 44)			
IV.	"seco	ombination of Angles, Merriman, and HTTP1.0 does not teach a nd [banner] request signal that is a "content specific request" (698 claims 7, 20)			
V.	teach	combination of Angles, Merriman, HTTP1.0, and Davis does not han advertisement provider computer sending a redirect back to f (698 claims 31, 49)			
VI.	Objective indicia of non-obviousness show the claims are not invalid36				
	A.	MatchLogic's TrueCount Technology practiced the claims of the 698 Patent			
	В.	MatchLogic's TrueCount Technology met a long-felt but unmet need			
		1. The industry recognized that efficiently delivering advertisements while accurately counting the display of those advertisements was a problem			
		2. MatchLogic's TrueCount Technology solved the problem			
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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/updatesmed ia- and-technology-software-to-track-business-prospects-by-web-visits.html
AHBLT-2003	Rick E. Bruner, Interactive: Media & Marketing: MatchLogic Service Solves Cache Problem, AdvertisingAge (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.netgravity.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/



	Patent 6,014,698
AHBLT-(Exhibit #)	Description
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- officiallyacquired-doubleclick.html
AHBLT-2013	Duane Wessels, Web Caching, O'Reilly & Associates, Inc. (June 2001)
AHBLT-2014	Excerpt of File History for U.S. Patent No. 6,286,045
AHBLT-2015	Declaration of Kevin C. Almeroth
AHBLT-2016	Declaration of Michael Griffiths
AHBLT-2017	Excerpts of the Deposition Transcript of Peter Kent
AHBLT-2018	Additional excerpts from CGI Programming Guide on the World Wide Web, Shishir Gundavaram, (1st Ed., March 1996), http://www.oreilly.com/openbook/cgi/
AHBLT-2019	HTML Sourcebook, A Complete Guide to HTML by Ian S. Graham (1995)



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