

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WHATSAPP INC. and FACEBOOK, INC.

Petitioners

v.

TRIPLAY, INC.

Patent Owner

Care IPR2015-00740

Patent 8,332,475 B2

PATENT OWNER'S SUBMISSION PURSUANT TO
APRIL 19, 2016 ORDER (PAPER NO. 42)

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313- 1450

Pursuant to the Patent Trial And Appeal Board's Order dated April 19, 2016

(Paper No. 42), Patent Owner submits the following:

1. Mr. Klausner's Reply Declaration, Ex. 1013 at ¶ 29;
2. Petitioners' Reply (Paper No. 39) at page 13, lines 1 - 13;
3. Mr. Klausner's Reply Declaration, Exhibit 1013 at ¶ 30;
4. Petitioners' Reply (Paper No. 39) at page 13, line 14 - page 14, line 4;
5. Mr. Klausner's Reply Declaration, Ex. 1013 at ¶ 38;
6. Petitioners' Reply (Paper No. 39) at page 18, lines 5 - 16;
7. Mr. Klausner's Reply Declaration, Ex. 1013 at ¶ 47;
8. Petitioners' Reply (Paper No. 39) at page 21, lines 10 - 16;
9. Mr. Klausner's Reply Declaration, Ex. 1013 at ¶ 51;
10. Petitioners' Reply (Paper No. 39) at page 22, line 19 - page 23, line 18;
11. Mr. Klausner's Reply Declaration, Ex. 1013 at ¶ 52; and

12. Petitioners' Reply (Paper No. 39) at page 23, line 19 - page 24, line 4.

Dated: April 26, 2016

Respectfully submitted,

By /Barry J. Schindler/
Barry J. Schindler (Reg. No. 32,938)
Douglas Weider
Lennie A. Bersh (Reg. No. 55,000)
Greenberg Traurig, LLP
500 Campus Drive, Suite 400
Florham Park, NJ 07932
Telephone: 973-360-7900
Facsimile: 973-301-8410
SchindlerB@gtlaw.com
njdocket@gtlaw.com

*Counsel for Patent Owner TriPlay
Inc.*

CERTIFICATE OF SERVICE

I hereby certify, pursuant to 37 C.F.R. § 42.6 and 42.105, that a complete copy of the attached PATENT OWNER'S SUBMISSION PURSUANT TO APRIL 19, 2016 ORDER is being served via electronic mail transmission addressed to the persons at the address below:

hkeefe@cooley.com

amace@cooley.com

mweinstein@cooley.com

rchen@cooley.com

WhatsApp_PTAB_IPR@cooley.com

Heidi L. Keefe

COOLEY LLP

1299 Pennsylvania Ave., NW, Suite 700

Washington, DC 20004

Tel: (650) 843-5001

Fax: (650) 849-7400

Respectfully submitted,

Dated: April 26, 2016

By /Barry J. Schindler/

Barry J. Schindler (Reg. No. 32,938)

Douglas Weider

Lennie A. Bersh (Reg. No. 55,000)

Greenberg Traurig, LLP

500 Campus Drive, Suite 400

Florham Park, NJ 07932

Telephone: 973-360-7900

Facsimile: 973-301-8410

SchindlerB@gtlaw.com

njdocket@gtlaw.com

Counsel for Patent Owner TriPlay Inc.