

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WHATSAPP, INC. AND FACEBOOK, INC.  
Petitioners

v.

TRIPLAY, INC.  
Patent Owner

*Inter Partes* Review No. 2015-00740  
U.S. Patent No. 8,332,475

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**PETITIONERS' SUBMISSION PURSUANT TO  
APRIL 19, 2016 ORDER (PAPER 42)**

Pursuant to the Board's Order dated April 19, 2016 (Paper 42), Petitioners WhatsApp, Inc. and Facebook, Inc. hereby submit the following:

1. **Responsive** to Surati Decl. (Ex. 2002), at ¶ 113 (*cited in* PO Resp., p. 37);
2. **Responsive** to PO Resp. (Paper 33), at p. 36, ll. 4-5 (“[N]either . . . template.”), p. 36, ln. 19 - p. 37, ln. 12 (“This . . . ¶ 113.”);
3. **Responsive** to Surati Decl. (Ex. 2002), at ¶ 113 (*cited in* PO Resp., p. 37);
4. **Responsive** to PO Resp. (Paper 33), at p. 36, ll. 4-5 (“[N]either . . . template.”), p. 36, ln. 19 - p. 37, ln. 4 (“This . . . elements’).”);
5. **Initially raised** in Original Decl. (Ex. 1002), at ¶¶ 118, 119; **responsive** to Surati Decl. (Ex. 2002), at ¶¶ 89, 90 (*cited in* PO Resp., p. 29), 95, 116 (*cited in* PO Resp., p. 38);
6. **Initially raised** in Pet. (Paper 1), at p. 51, ll. 15-18 (“Additionally, . . . ¶ 119.”) (*citing* Original Decl., ¶ 119); **responsive** to PO Resp. (Paper 33), at p. 29, ll. 4-17 (“Patent . . . claim”), p. 38, ll. 13-19 (“But . . . (*Id.*)”);
7. **Initially raised** in Original Decl. (Ex. 1002), at ¶¶ 90, 108; **responsive** to Surati Decl. (Ex. 2002), at ¶¶ 124, 127, 128, 148;
8. **Initially raised** in Pet. (Paper 1), at p. 47, ln. 15 - p. 48 ln. 14 (“Rationale . . . ¶ 108.”) (*citing* Original Decl., ¶ 108); **responsive** to PO Resp. (Paper 33), at p. 41, ln. 21 - p. 42, ln. 2 (“Petitioner has not . . . showing.”), p. 44, ll. 6-8 (“Mr. Klausner . . . Coulombe.”), p. 45, ll. 2-19 (“In . . . apply Druyan.”);

9. **Responsive** to Surati Decl. (Ex. 2002), at ¶¶ 69 (*cited in* PO Resp., p. 24), 70, 125 (*cited in* PO Resp., p. 40), 129 (*cited in* PO Resp., p. 43), 131 (*cited in* PO Resp., pp. 45-46);
10. **Responsive** to PO Resp. (Paper 33), at p. 23, ln. 8 - p. 24, ln. 1 (“As Dr. . . . ¶ 69.”), p. 40, ll. 17-20 (“Druyan requires . . . (*Id.*)”), p. 43, ll. 13-15 (“Druyan teaches . . . at pg. 3.”), p. 45, ln. 20 - p. 46, ln. 6 (“Druyan contains . . . (*Id.*)”).
11. **Initially raised** in Original Decl. (Ex. 1002), at ¶ 113; **responsive** to Surati Decl. (Ex. 2002), ¶¶ 69 (*cited in* PO Resp., p. 24), 70, 125 (*cited in* PO Resp., p. 40), 129 (*cited in* PO Resp., p. 43), 131 (*cited in* PO Resp., pp. 45-46);
12. **Initially raised** in Pet. (Paper 1), at p. 42, ll. 17-19 (“Tittel . . . 57-84.”), p. 49, ll. 3-6 (“One . . . 109-113.”) (*citing* Original Decl., ¶ 113); **responsive** to PO Resp. (Paper 33), at p. 23, ln. 8 - p. 24, ln. 1 (“As Dr. . . . ¶ 69.”), p. 40, ll. 17-20 (“Druyan requires . . . (*Id.*)”), p. 43, ll. 13-15 (“Druyan teaches . . . at pg. 3.”), p. 45, ln. 20 - p. 46, ln. 6 (“Druyan contains . . . (*Id.*)”).

Dated: May 3, 2016

Respectfully submitted,

COOLEY LLP  
Patent Group  
1299 Pennsylvania Ave., NW, Suite 700  
Washington, DC 20004

By: / Heidi L. Keefe/  
Heidi L. Keefe  
Reg. No. 40,673  
Counsel for Petitioners

**CERTIFICATE OF SERVICE**

I hereby certify, pursuant to 37 C.F.R. Section 42.6, that a complete copy of the attached **PETITIONERS' SUBMISSION PURSUANT TO APRIL 19, 2016 ORDER (PAPER 42)** is being served via electronic mail on the 3rd day of May, 2016, the same day as the filing of the above-identified document in the United States Patent and Trademark Office/Patent Trial and Appeal Board, upon the Patent Owner by serving counsel of record as follows:

Barry Schindler  
SchindlerB@gtlaw.com  
Greenberg Traurig, LLP  
[njdocket@gtlaw.com](mailto:njdocket@gtlaw.com)

Jeremy J. Monaldo  
Fish & Richardson P.C.  
[monaldo@fr.com](mailto:monaldo@fr.com)

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/ Heidi L. Keefe /  
Heidi L. Keefe  
Reg. No. 40,673

COOLEY LLP  
Patent Docketing  
1299 Pennsylvania Ave. NW, Suite 700  
Washington, D.C. 20004  
Tel: (650) 843-5001  
Fax: (650) 849-7400