NO: _____

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
_____

BEFORE THE PATENT TRIAL AND APPEAL BOARD
_____

THE MANGROVE PARTNERS MASTER FUND, LTD.
Petitioner,

v.

VIRNETX INC.,
Patent Owner.

_____

Case IPR2015-_____
Patent U.S. 6,502,135

_____

**PETITION FOR INTER PARTES REVIEW OF UNITED STATES
PATENT NO. 6,502,135 PURSUANT TO 35 U.S.C. §§ 311-319, 37 C.F.R. § 42**

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EXHIBITS

Ex. 1001	U.S. Patent No. 6,502,135 to Munger et al. (the "'135 Patent")
Ex. 1002	Takahiro Kiuchi and Shigekoto Kaihara, "C-HTTP - The Development of a Secure, Closed HTTP-based Network on the Internet," published by IEEE in the Proceedings of SNDSS 1996 ("Kiuchi")
Ex. 1003	Declaration of Dr. Roch Guerin
Ex. 1004	(Reserved)
Ex. 1005	Mockapetris, P., RFC 1034, "Domain Names–Concepts and Facilities," Nov. 1997
Ex. 1006	(Reserved)
Ex. 1007	Patent Owner's Preliminary Response, Paper 7, in IPR2014-00610
Ex. 1008	Excerpts from Webster's Third New International Dictionary (1971)
Ex. 1009	VirnetX's Reply Claim Construction Brief in *VirnetX Inc. v. Cisco Systems, Inc. et al.*, 6:10-cv-417 (Dec. 19, 2011) (E.D. Tex.)
Ex. 1010	Bradner, S., RFC 2026, "The Internet Standards Process – Revision 3," Oct. 1996
Ex. 1011	Decision to Institute *Inter Partes* Review, Paper 9, in IPR2014-00610 (Oct. 15, 2014)
Ex. 1012	(Reserved)
Ex. 1013	(Reserved)
Ex. 1014	Berners-Lee et al., RFC 1945, "Hypertext Transfer Protocol -- HTTP/1.0," May 1996
Ex. 1015	Patent Owner's Preliminary Response, Paper 10, in IPR2013-00348
Ex. 1016	Eastlake, D., RFC 2535, "Domain Name System Security Extensions," Mar. 1999
Ex. 1017	Patent Owner's Comments in Response to Examiner's Determination in *Inter Partes* Reexamination 95/001,792 (March, 11, 2015)
Ex. 1018	VirnetX's Opening Claim Construction Brief in *VirnetX Inc. v. Cisco Systems, Inc. et al.*, 6:10-cv-417 (Dec. 19, 2011) (E.D. Tex.)
Ex. 1019	Memorandum Opinion and Order in *VirnetX Inc. v. Cisco Systems, Inc. et al.*, 6:10-cv-417 (April 25, 2012) (E.D. Tex.)
Ex. 1020	Petition for *Inter Partes* Review in IPR2013-00349
Ex. 1021	Patent Owner's Preliminary Response, Paper 11, in IPR2014-00558

Ex. 1022	Decision to Institute *Inter Partes* Review, Paper 15, in IPR2014-00237
Ex. 1023	"Glossary for the Linux FreeS/WAN project," (Feb. 21, 2002)
Ex. 1024	(Reserved)
Ex. 1025	Declaration of Dr. Roch Guerin in IPR2014-00401

The Mangrove Partners Master Fund, Ltd. ("Petitioner" or "Mangrove") petitions for Inter Partes Review ("IPR") under 35 U.S.C. §§ 311–319 and 37 C.F.R. § 42 of claims 1, 3, 4, 7, 8, 10, and 12 ("the Challenged Claims") of U.S. Patent No. 6,502,135 ("the '135 Patent"). As explained in this petition, there exists a reasonable likelihood that Mangrove will prevail with respect to at least one of the Challenged Claims.

The Challenged Claims are unpatentable based on teachings set forth in at least the references presented in this petition. Mangrove respectfully submits that an IPR should be instituted, and that the Challenged Claims should be canceled as unpatentable.

I.   MANDATORY NOTICES UNDER 37 C.F.R § 42.8(A)(1)

A.   REAL PARTY-IN-INTEREST UNDER 37 C.F.R. § 42.8(B)(1)

Petitioner, The Mangrove Partners Master Fund, Ltd., is the real party-in-interest.

B.   RELATED MATTERS UNDER 37 C.F.R. § 42.8(B)(2)

The '135 Patent is the subject of a number of civil actions including: (i) Civ. Act. No. 6:13-cv-00211-LED (E.D. Tex.), filed February 26, 2013; (ii) Civ. Act. No. 6:12-cv-00855-LED (E.D. Tex.), filed November 6, 2012; and (iii) Civ. Act. No. 6:10-cv-00417-LED (E.D. Tex.), filed August 11, 2010.

The '135 Patent was the subject of petitions for *inter partes* review filed by RPX Corporation (IPR2014-00171 and IPR2014-00172), Apple, Inc. (IPR2013-

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