

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

RARITAN AMERICAS, INC. D/B/A RARITAN COMPUTER, INC.,
Petitioner

v.

SERVER TECHNOLOGY, INC.,
Patent Owner

Case IPR2015-01596

U.S. Patent No. 7,702,771
Title: Electrical Power Distribution Device
Having a Current Display
Filed: October 11, 2006
Issued: April 20, 2010

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,702,771**

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	MANDATORY NOTICES	4
	A. Real Party-in-Interest [37 C.F.R. § 42.8(b)(1)].....	4
	B. Related Matters [37 C.F.R. § 42.8(b)(2)].....	4
	C. Lead/Back-up Counsel [37 C.F.R. § 42.8(b)(3)]	5
	D. Service Information [37 C.F.R. § 42.8(b)(4)]	5
III.	GROUND FOR STANDING [37 C.F.R. § 42.104(a)].....	5
IV.	BACKGROUND ON THE ‘771 PATENT.....	5
	A. The Claims and Specification	5
	B. The Parent ‘543 Patent and Ongoing Reexamination Appeal	7
	C. The Prosecution History of the ‘771 Patent	9
	D. Priority Date	10
V.	IDENTIFICATION OF CHALLENGE AND STATEMENT OF THE PRECISE RELIEF REQUESTED	11
	A. Claims For Which <i>Inter Partes</i> Review Is Requested And Precise Relief Requested [37 C.F.R. §§ 42.104(b) and (b)(1)].....	11
	B. The Specific Prior Art And Statutory Grounds On Which The Challenge Is Based [37 C.F.R. § 42.104(b)(2)]	11
	C. How The Challenged Claims Are to Be Construed [37 C.F.R. § 42.104(b)(3)]	12
	1. “Electrical power distribution device”	13
	2. “Current related information display”	15
	3. “Intelligent power section/module”	17
	D. Identification and Relevance of the Supporting Prior Art Evidence [37 C.F.R. § 42.104(b)(5)]	18

1.	The MasterSwitch Vertical Mount (“MSVM”) Literature (Exs. 1013-1015).....	18
2.	U.S. Patent No. 6,741,442 to McNally (Ex. 1017).....	19
3.	U.S. Patent No. 5,949,974 to Ewing (Ex. 1012).....	20
4.	The Baytech RPC-7 Literature (Exs. 1018-1020)	21
5.	U.S. Patent No. 5,650,771 to Lee (Ex. 1022)	22
6.	U.S. Patent No. 6,476,729 to Liu (Ex. 1023).....	23
7.	U.S. Patent No. 5,595,494 to Wiebe (Ex. 1024).....	23
8.	Other Evidence of the State of the Art.....	24
E.	How The Construed Claims Are Unpatentable and Where Each Element of the Claims Are Found in the Prior Art [37 C.F.R. §§ 42.104(b)(4) and (b)(5)]	24
1.	Ground 1: The MSVM Literature renders obvious claims 1-14.	24
2.	Ground 2: The MSVM Literature in view of Lee renders obvious claims 15-23.	33
3.	Ground 3: McNally anticipates claims 1-14.....	38
4.	Ground 4: McNally in view of Liu renders obvious claims 15-23.....	44
5.	Ground 5: Ewing ‘974 in view of Wiebe, further in view of Lee, renders obvious claims 1-23.....	46
6.	Ground 6: The BayTech RPC-7 Literature in view of Lee renders obvious claims 1-23.	53
F.	Patent Owner’s Purported Secondary Considerations of Nonobviousness Cannot Overcome This Strong Case of Invalidity.	59
VI.	CONCLUSION.....	60

LIST OF EXHIBITS

Exhibit No.	Description
1001	U.S. Patent No. 7,702,771 to Ewing
1002	U.S. Patent No. 7,043,543 to Ewing
1003	Right of Appeal Notice (37 CFR 1.953), Reexam of U.S. 7,043,543, Control No. 95/001,485, October 24, 2013 (“543 RAN”)
1004	Detailed Request for <i>Inter Partes</i> Reexamination of U.S. 7,043,543, Control No. 95/001,485, November 12, 2010 (“543 Patent Reexam Request”)
1005	Office Action, Reexam of U.S. 7,043,543, Control No. 95/001,485, March, 29, 2012 (“543 Reexam Office Action”)
1006	Office Action, U.S. Serial No. 11/548,471, July 14, 2008
1007	Reply After Non-Final Action, U.S. Serial No. 11/548,471 October 7, 2008
1008	Supplemental Information Disclosure Statement, U.S. Serial No. 11/548,471, October 20, 2008
1009	Requirement for Information under 37 C.F.R. § 1.105, U.S. Serial No. 11/548,471, June 25, 2009
1010	Reply to Requirement for Information (37 CFR § 1.105), U.S. Serial No. 11/548,471, December 23, 2009
1011	Reasons for Allowance, U.S. Serial No. 11/548,471, February 26, 2010
1012	U.S. Patent No. 5,949,974 to Ewing
1013	MasterSwitch VM Power Distribution Unit User Guide, December 1999 (“MSVM User Guide”)

Exhibit No.	Description
1014	MasterSwitch VM Power Distribution Unit Installation and Quick Start Manual, December 1999 (“MSVM Quick Start”)
1015	PowerNet SNMP Management Information Base (MIB) v3.1.0 Reference Guide, November, 1999 (“MSVM PowerNet Guide”)
1016	Declaration of Patrick Johnson, Reexam of U.S. 7,043,543, Control No. 95/001,485, May 16, 2011 (“Johnson Decl.”)
1017	U.S. Patent No. 6,741,442 to McNally
1018	Baytech Remote Power Control Unit Owner’s Manual, BayTech Manual Publication #U140E125-05, January 2000 (“Baytech Manual”)
1019	Baytech Vertical-Mount Data Center Power Control Press Release, October 13, 1999 (“Baytech Press Release”)
1020	Download of Baytech RPC Series Webpage from web.archive.org, capturing webpage as of October 6, 2000 (“Baytech Webpage”)
1021	Declaration of Alex North, Reexam of U.S. 7,043,543, Control No. 95/001,485, May 13, 2011 (“North Decl.”)
1022	U.S. Patent No. 5,650,771 to Lee
1023	U.S. Patent No. 6,476,729 to Liu
1024	U.S. Patent No. 5,595,494 to Wiebe
1025	U.S. Patent No. 4,853,619 to Paulsen
1026	Systems Enhancement Corporation PA-800 Manual, October 1, 1996
1027	Systems Enhancement Corporation PA-800 Manual, October 31, 1996

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.