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Paper No. __

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RPX Corporation

Petitioner

v.

Applications in Internet Time, LLC

Patent Owner

_____

Case No. TBD

Patent No. 7,356,482

_____

PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1, 7-21, 27-41, AND 47-59 OF U.S. PATENT NO. 7,356,482 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.1 *et seq.*

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TABLE OF AUTHORITIES

CASES

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Aristocrat Techs. Austl. Aty. Ltd. v. Int'l Game Tech.,
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Golight, Inc. v. Wal-Mart Stores Inc.,
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Salesforce.com, Inc. v. Applications in Internet Time LLC,
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Teva Pharm. USA, Inc. v. Sandoz, Inc.,
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Williamson v. Citrix,
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