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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*

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Case No. TBD  
Patent No. 7,356,482

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**PETITION FOR *INTER PARTES* REVIEW OF  
CLAIMS 2-6, 22-26, AND 42-46 OF U.S. PATENT NO. 7,356,482  
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42.1 *et seq.***

**TABLE OF CONTENTS**

I. INTRODUCTION .....1

II. MANDATORY NOTICES .....2

    A. Real Parties-in-Interest .....2

    B. Related Matters.....3

    C. Counsel and Service Information .....3

III. NOTICE OF FEES PAID.....4

IV. CERTIFICATION OF GROUNDS FOR STANDING .....4

V. IDENTIFICATION OF CHALLENGE AND RELIEF REQUESTED .....4

    A. Level of Ordinary Skill in the Art .....6

    B. Technology Overview .....6

    C. The ‘482 Patent.....7

VI. CLAIM INTERPRETATION .....9

    A. “application” .....9

    B. “layer” .....9

    C. “change management layer for automatically detecting changes that affect an application” .....10

    D. “means for distributing one or more JAVA applets to the client computer” .....10

    E. “database” .....11

    F. “means for dynamically generating a particular application based on the first and second layers each time a client computer connects to the server computer” .....12

VII. THRESHOLD REQUIREMENT FOR <i>INTER PARTES</i> REVIEW .....	13
VIII. CLAIM-BY-CLAIM EXPLANATION OF GROUNDS FOR UNPATENTABILITY OF CLAIMS 2-6, 22-26, AND 42-46 .....	13
A. <u>Ground 1</u> : Popp Anticipates Claims 2, 22, and 42 .....	15
B. <u>Ground 2</u> : Claims 2, 22, and 42 Would Have Been Obvious over Balderrama in View of Java Complete.....	25
C. <u>Grounds 3 and 4</u> : Claims 3-6, 23-26, and 43-46 Would Have Been Obvious over Popp in view of Codd (Ground 3), and over Balderrama and Java Complete in view of Codd (Ground 4).....	37
i. <u>Ground 3</u> : Claims 3-6, 23-26, and 43-46 Would Have Been Obvious over Popp in view of Codd .....	39
ii. <u>Ground 4</u> : Claims 3-6, 23-26, and 43-46 Would Have Been Obvious over Balderrama and Java Complete in view of Codd.....	44
D. <u>Ground 5</u> : Claims 3-6, 23-26, and 43-46 Would Have Been Obvious over Kovacevic in view of Codd .....	48
IX. CONCLUSION.....	60

**TABLE OF AUTHORITIES**

**CASES**

*Applications in Internet Time, LLC v. Salesforce.com, Inc.*,  
No. 3:13-cv-00628.....3

*Aristocrat Techs. Austral. Pty. Ltd. v. Int’l Game Tech.*,  
521 F.3d 1328 (Fed. Cir. 2008) .....11

*Golight, Inc. v. Wal-Mart Stores Inc.*,  
355 F.3d 1327 (Fed. Cir. 2004) .....11

*Salesforce.com, Inc. v. Applications in Internet Time LLC*,  
CBM2014-00168, Paper No. 9 (PTAB 2014)..... 3, 10

*Williamson v. Citrix*,  
No. 2013-1130 (Fed. Cir. Jun. 16, 2015) .....10

**STATUTES**

35 U.S.C. § 102(a) ..... 5, 25

35 U.S.C. § 102(b) ..... 5, 25, 37, 48

35 U.S.C. § 102(e) ..... 4, 5, 15, 25

35 U.S.C. § 103(a) .....4, 5

35 U.S.C. § 112 ..... 10, 12

35 U.S.C. § 311 .....1

35 U.S.C. § 314(a) .....13

**REGULATIONS**

37 C.F.R. § 42.100(b) .....9

37 C.F.R. § 42.104(a).....4

## I. INTRODUCTION

RPX Corporation (“RPX”) requests *inter partes* review of claims 2-6, 22-26, and 42-46 of U.S. Patent No. 7,356,482 (“the ‘482 patent”) (Ex. 1101) pursuant to 35 U.S.C. § 311. The claimed subject matter of the ‘482 patent was well known before its filing date. *See, e.g.*, Declaration of Mark E. Crovella, Ph.D., Ex. 1102 (“Crovella”), ¶¶ 12-17.

While the specification of the ‘482 patent is directed to a system for managing information affected by regulatory changes, the claims are much more broadly directed to systems and methods for dynamically generating an application using a classic and well-known multi-layered architecture. This multi-layered architecture (often referred to as a model-view-controller or MVC architecture) dates back to the 1970s and was developed to facilitate the design of software applications in a way that leverages the commonality among user interface (UI) elements and other aspects of many software applications.

The MVC architecture separates application software into distinct compartmentalized portions in a way that facilitates code sharing and reuse across applications. A first layer includes application-specific code and data unique to a particular application. A second layer contains generic UI elements (e.g., buttons, input fields, etc.) that can be shared across multiple applications so that generic UI elements need not be coded separately for every application. A third layer integrates

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