

Filed on behalf of Petitioner

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Paper No. __

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

RPX Corporation

Petitioner

v.

Applications in Internet Time, LLC

Patent Owner

Case IPR2015-01750
Patent 8,484,111 B2

Case IPR2015-01751
Case IPR2015-01752
Patent 7,356,482 B2¹

**PETITIONER'S (REDACTED) REPLY TO PATENT OWNER'S
PRELIMINARY RESPONSE ON REAL-PARTY-IN-INTEREST(RPI)**

¹ The word-for-word identical paper is filed in each proceeding identified in the heading.

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RULES

77 F. Reg. at 48759 3, 4, 8

I. INTRODUCTION

RPX filed the petitions to further its own interests and is the sole RPI. The petitions' identification of RPI is presumed correct. To rebut that presumption AIT must provide **sufficient evidence** to call RPX's identification of RPI into question.

AIT was granted extensive discovery into (1) agreements between RPX and Salesforce; (2) communications between RPX and Salesforce, including any relating to these IPRs, the underlying patents and/or the litigation involving them; (3) any funds RPX received to pay for the IPRs; and (4) the reasons why RPX filed the IPRs. Paper 11. RPX provided all responsive documents and a sworn declaration from William Chuang, VP of Client Relations at RPX, who was involved in and explains RPX's decision to file the IPRs. Ex. 1019 at ¶¶1, 5 and 34.² [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *Id.* at ¶47.

As Mr. Chuang states unequivocally, "RPX had no communication with Salesforce whatsoever regarding the filing of IPR petitions against the AIT Patents

² Citations are to the Exhibit numbers used in IPR2015-01750 and IPR2015-01751.

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