

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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Command Web Offset Company, Inc., Worzalla Publishing Company,  
Sandy Alexander, Inc., Publication Printers Corp.,  
Specialty Promotions, Inc., and Trend Offset Printing Services Inc.,

Petitioners,

v.

CTP Innovations, LLC,

Patent Owner.

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Case IPR2016-00008

Patent 6,611,349

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**CTP INNOVATIONS, LLC'S PRELIMINARY RESPONSE TO PETITION**

Filed on behalf of CTP Innovations, LLC

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Patent Owner, CTP Innovations, LLC (“Patent Owner”), pursuant to 35 U.S.C. § 313 and 37 C.F.R. § 42.107, submits its Preliminary Response to Command Web Offset Company’s, Worzalla Publishing Company's, Sandy Alexander, Inc.'s, Publication Printers Corp.'s, Specialty Promotions, Inc.'s and Trend Offset Printing Services, Inc.'s (collectively, the “Petitioners”) Petition for *Inter Partes* Review of U.S. Patent No. 6,611,349 (“the ‘349 Patent”).

## I. INTRODUCTION

This Petition is the third round of petitions filed against the ‘349 Patent and a related patent (U.S. 6,738,155) on behalf of a group of printing service providers who have been sued for infringement in a number of cases. *See* Ex. 1002. The Petitioners in this matter are participants in some of those cases. In this Petition, Petitioners assert that claims 4-14 of the ‘349 Patent should be invalidated on the basis of obviousness.

This Petition follows the Board's determinations to reject similar petitions filed against this same set of claims over the past two years. *See* Exs. 1004 (Decision Denying Petition to Institute in IPR2013-00474), 1005 (Decision Instituting IPR in IPR 2014-00791), 1013 (Decision Regarding Request for Rehearing in IPR 2014-00791). Patent Owner intends to vigorously contest Petitioners’ assertions in this Petition if the Board initiates an *Inter Partes* Review. However, for purposes of its preliminary response, Patent Owner submits that

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