

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

---

WTS Paradigm, LLC,

Petitioner

v.

EdgeAQ, LLC,

Patent Owner

---

Case IPR: Unassigned

Patent 7,805,461

---

**PETITION FOR INTER PARTES REVIEW**  
**OF U.S. PATENT NO. 7,805,461**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
United States Patent and Trademark Office  
P. O. Box 1450  
Alexandria, VA 22313-1450

## Table of Contents

I.	MANDATORY NOTICES (37 CFR § 42.8)	1
II.	GROUND S FOR STANDING AND IDENTIFICATION OF CHALLENGE (37 CFR § 42.104)	1
A.	Standing And Statutory Grounds For Each Claim	1
B.	Claim Construction	3
C.	How The Claim Is Unpatentable	3
D.	Evidence Supporting Challenge	4
III.	THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE	4
A.	Description Of The Alleged Inventions	4
B.	Ground 1: Claims 1–11 Are Unpatentable Under 35 USC § 103 By The Combination of Greef, Bader, and Weida	7
1.	Background on the claimed subject matter	7
2.	Greef nearly anticipates the Challenged Claims	9
3.	In view of the prior art, Greef renders the Challenged Claims obvious	12
a.	Greef recognizes an issue with its system’s identification of attributes and proposes one solution	12
b.	Bader teaches an alternative solution: prompting the user to identify attributes	12
c.	Bader and Greef teach that prompting the user to identify attributes can rely on an indirect identification	17
d.	Weida teaches that user input should occur via predefined questions	19
e.	The Challenged Claims are obvious	21
4.	The combination of Greef with Bader and Weida discloses every limitation of Claim 1	22
5.	The combination of Greef with Bader and Weida discloses every limitation of Claims 2–5	40

Table of Contents  
(continued)

6.	The combination of Greef with Bader and Weida discloses every limitation of Claim 6 .....	47
7.	The combination of Greef with Bader and Weida discloses every limitation of Claims 7–11 .....	51
C.	Ground 2: Claims 1–11 Are Rendered Unpatentable Under 35 USC § 103 By The Combination of Greef, Weider, Bader, And Altman .....	57
1.	The combination of Greef with Bader, Weida, and Altman renders the Challenged Claims obvious .....	57
2.	The combination of Greef with Bader, Weida, and Altman discloses every limitation of Claims 1–11 .....	59
IV.	CONCLUSION.....	60

## Exhibit List (37 C.F.R. §42.63(e))

Exhibit No.	Brief Description
1001	Declaration of Deborah McGuinness
1002	<i>Curriculum vitae</i> of Deborah McGuinness
1003	Declaration of Louis A. Klapp
1004	U.S. Patent No. 7,805,461 (“the ’461 Patent”)
1005	U.S. Patent No. 6,397,221 (“Greef”)
1006	U.S. Patent No. 6,810,401 (“the ’401 Patent”)
1007	Fikes & Kehler, <i>The Role of Frame Based Representation in Reasoning</i> , Communication of the ACM, Volume 28, Number 9 (September 1985) (“Fikes”)
1008	Excerpts from Alison Cawsey, <i>The Essence of Artificial Intelligence</i> (1998) (“Cawsey”)
1009	U.S. Patent No. 6,108,670 (“Weida”)
1010	U.S. Patent No. 5,953,726 (“Carter”)
1011	U.S. Patent No. 5,467,471 (“Bader”)
1012	U.S. Patent No. 6,442,566 (“Altman”)
1013	Wright et al., <i>A Knowledge-Based Configurator That Supports Sales, Engineering, and Manufacturing at AT&amp;T Network Systems</i> , AI Magazine (Fall 1993) (“Wright”)

In accordance with 35 U.S.C. § 311 Petitioner WTS Paradigm, LLC (“WTS”) respectfully requests *inter partes* review (“IPR”) of Claims 1–11 of U.S. Patent No. 7,805,461 (“the ’461 Patent”), attached hereto as Exhibit 1004.

**I. MANDATORY NOTICES (37 CFR § 42.8)**

WTS is the real party-in-interest for Petitioner. EdgeAQ, LLC (“EdgeAQ”) has asserted the ’461 Patent in a pending patent infringement lawsuit, *WTS Paradigm, LLC v. EdgeAQ, LLC*, No. 3:15–cv–00330 (W.D. Wis.). This case may affect, or be affected by, decisions in this proceeding.

WTS provides the following designation of counsel, to which all correspondence should be addressed (WTS consents to service by email):

<b>Lead Counsel</b>	<b>Backup Counsel</b>
Michael Jaskolski (Reg. No. 37,551) michael.jaskolski@quarles.com QUARLES & BRADY LLP 411 East Wisconsin Avenue, Suite 2400 Milwaukee, Wisconsin 53202 Telephone: (414) 277-5711 Fax: (414) 978-8711	Louis A. Klapp (Reg. No. 73,603) louis.klapp@quarles.com QUARLES & BRADY LLP 300 North LaSalle Street, Suite 4000 Chicago, Illinois 60654 Telephone: (312) 715-2712 Fax: (312) 632-1948

**II. GROUNDS FOR STANDING AND IDENTIFICATION OF CHALLENGE (37 CFR § 42.104)**

**A. Standing And Statutory Grounds For Each Claim**

Petitioner certifies that the ’461 Patent is available for *inter partes* review having been filed on April 10, 2007, and that Petitioner is not barred or estopped from requesting this *inter partes* review.

# 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.