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

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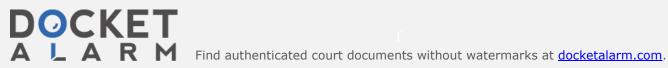


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Exhibit List (37 C.F.R. §42.63(e))

| Exhibit No. | Brief Description | |
|-------------|---|--|
| 1001 | Declaration of Deborah McGuinness | |
| 1002 | Curriculum vitae 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., A Knowledge-Based Configurator That Supports Sales, Engineering, and Manufacturing at AT&T Network Systems, 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):

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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.



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