UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD PLAID TECHNOLOGIES INC. Petitioner V. YODLEE, INC. Patent Owner Case IPR2016-00273 Patent 6,317,783

PATENT OWNER'S RESPONSE



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	B.	"intermediary web site" (claims 14, 33)				
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IV.		PETITIONER HAS FAILED TO SHOW THAT ANY CLAIM OF THE '783 PATENT IS INVALID				
	A.	Sugiarto and Brandt Do Not Render Obvious Independent Claims 1, 18, and 20 Regardless of Whether "non-public personal information" is Given Patentable Weight				
		1. The references do not disclose a "protocol for instructing the processor how to access the securely stored personal information via the network"				
		2. The references do not disclose "storing the retrieved personal information in [a/the] personal information store"				
	В.	Sugiarto and Brandt Do Not Render Obvious Independent Claims 1, 18, and 20 if "non-public personal information" is Given Patentable Weight				
		1. The references do not disclose "non-public personal information"				
		2. The references do not disclose non-public personal information "also being accessible by the end user via the network				



			independently of the system for delivering personal information"	38
	C.		ioner's Proposed Combination is Deficient and the References h Away from Making this Combination	
	D.	the '	arto and Brandt Do Not Render Obvious the Dependent Claim 783 Patent, Regardless of Whether "non-public personal mation" is Given Patentable Weight	
		1.	The references do not disclose "intermediary web site" (clair 14-17, 33-36)	
		2.	The references do not disclose "associated user interface format" / "format associated with the intermediary web site" "format other than the format associated with the intermediat web site" (claims 14, 15, 17, 33, 34, 36)	ry
		3.	The references do not disclose "monitoring information providers for changes" (claims 2 and 21)	46
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EXHIBIT LIST

Exhibit No.	Description
2001	ESPN Insider: Benefits, WayBackMachine June 22, 2001
2002	Declaration of David Barkan in Support of Motion for <i>Pro Hac Vice</i> Admission
2003	Declaration of Matthew McCullough in Support of Motion for <i>Pro Hac Vice</i> Admission
2004	Declaration of Todd C. Mowry in Support of Petition in Case No. CBM2016-00045
2005	Transcript of Deposition of Todd Mowry
2006	Memorandum Opinion re Claim Construction, <i>Yodlee, Inc. v. Plaid Techs., Inc.</i> , No. 14-1445-LPS, Dkt. 96 (D. Del. Jan. 15, 2016)
2007	Declaration of Zaydoon Jawadi in Support of Patent Owner's Response
2008	Curriculum Vitae of Zaydoon Jawadi
2009	Order re Claim Construction, <i>Yodlee, Inc. v. Block Financial Corp.</i> , No. 03-0831-CV-W-DW, Dkt. 79 (W.D. Mo. Dec. 2, 2004)
2010	Claim Construction Order, <i>Yodlee, Inc. v. CashEdge, Inc.</i> , No. C 05-01550 SI, Dkt. 66 (N.D. Cal. July 7, 2006)



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