

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLAID TECHNOLOGIES, INC.,
Petitioner

v.

YODLEE, INC.,
Patent Owner

IPR2016-00273

U.S. Patent No. 6,317,783

PETITIONER'S REPLY

Mail Stop **Patent Board**
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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GLOSSARY OF ABBREVIATIONS

Shorthand	Description
BRI	Broadest Reasonable Interpretation.
Petition	Petition, Paper 1 (Dec. 2, 2015).
POR	Patent Owner Response, Paper 17 (Sept. 23, 2015).
Mowry Decl.	Declaration of Todd Mowry in Support of Petition for <i>Inter Partes</i> Review, Ex. 1008 (Dec. 16, 2015)
Jawadi Decl.	Declaration of Zaydoon Jawadi in Support of Patent Owner Response, Ex. 2007 (Sept. 23, 2016).
Decision	Decision Granting Institution, Paper 10 (June 8, 2016).
'783 patent	U.S. Patent No. 6,317,783, Ex. 1001 (Dec. 2, 2015).
Sugiarto	U.S. Patent No. 6,278,449, Ex. 1004 (Dec. 2, 2015).
Brandt	U.S. Patent No. 5,892,905, Ex. 1005 (Dec. 2, 2015).
Chow	U.S. Patent No. 6,029,175, Ex. 1006 (Dec. 2, 2015).
Nielsen	U.S. Patent No. 6,066,333, Ex. 1010 (Dec. 2, 2015).
“Protocol” Limitation	“protocol for instructing the processor how to access the securely stored personal information via the network.”
“Storing” Limitation	“storing the retrieved personal information in [a/the] personal information store”
Mowry Dep.	Transcript of Deposition of Dr. Todd Mowry, Ex. 2005 (Sept. 23, 2016).
Jawadi Dep.	Transcript of Deposition of Mr. Zaydoon Jawadi, Ex. 1014 (Dec. 9, 2016).
Yodlee	Patent Owner Yodlee, Inc.
Plaid	Petitioner Plaid Technologies, Inc.

I. Introduction

The Board correctly found that the Petition and the declaration testimony of Plaid’s expert Dr. Mowry establish that claims 1, 3–20, and 22–36 would have been obvious over Sugiarto and Brandt, and that claims 2 and 21 would have been obvious over Sugiarto, Brandt, and Chow. An ordinary skilled artisan would have been motivated to modify Sugiarto’s content gathering modules to incorporate the automatic authentication functionality of Brandt’s Application Gateway 332, such that the content gathering modules would obtain non-public information over the Web from Secure Content Providers. Petition at 20-21; Mowry Decl., ¶ 60. Dr. Mowry further explained that it would have been obvious to incorporate Chow’s revision manager to keep users apprised of changes to content. *Id.*, ¶ 117. The Board’s well-reasoned analysis in the Institution Decision regarding obviousness stands untouched by Yodlee’s Response.

Yodlee first proposes several claim constructions that are wholly unsupported by the claim language and the patent specification. For example, it rehashes the argument that the term “non-public personal information” should carry patentable weight. The Board correctly rejected this proposition, finding instead that term has no functional or structural relationship to the remainder of the claim and therefore should not mean anything beyond “merely information.” Yodlee also raises, for the first time, constructions for the terms “protocol for instructing the processor how to

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