

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PLAID TECHNOLOGIES INC.
Petitioner

v.

YODLEE, INC. and YODLEE.COM, INC.
Patent Owners

Case IPR2016-00275
Patent 6,199,077

**PATENT OWNERS' OPPOSITION TO PETITIONER'S
MOTION TO CORRECT ELECTRONIC FILING DATE**

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EXHIBIT LIST

| Exhibit No. | Description |
|-------------|--|
| 2001 | 157 Cong. Rec. S5429 (daily ed. Sept. 8, 2011) (statement of Sen. Kyl) |

Pursuant to the Board's Order (Paper 8, February 1, 2016), Patent Owners Yodlee, Inc. and Yodlee.com, Inc. respectfully submit their Opposition to Petitioner's Motion to Correct Electronic Filing Date.

I. INTRODUCTION

Petitioner waited until 10:30 p.m. on the final night of the one-year deadline for filing an IPR petition, ran out of time, and was unable to complete the statutorily-mandated filing and service by December 2, 2015. Thus, per 35 U.S.C. § 312(a), the Petition cannot be accorded a filing date of December 2, 2015.

In response to its failure to meet the statutory requirements, Petitioner files this Motion seeking extraordinary relief, requesting an effective extension of the statutory deadline. But, Petitioner's filing problems arose from its own intentional delay in completing the petition, its decision not to file two petitions in parallel, and its failure to effect timely service, despite having every means at its disposal to do so. Petitioner thus cannot meet its burden of showing how the Board has authority on these facts to grant this extraordinary relief. Thus, the Motion should be denied.

II. PETITIONER FAILED TO SATISFY THE STATUTORY REQUIREMENTS AND CANNOT OBTAIN A DECEMBER 2 FILING DATE

The IPR statute only grants the PTO authority to institute an IPR if that petition is filed within one year of the Petitioner being served with a complaint for

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