

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**Twilio Inc.**  
Petitioner

v.

**TeleSign Corporation**  
Patent Owner

Patent No. 8,462,920

Patent Filing Date: October 5, 2006

Title: REGISTRATION, VERIFICATION AND NOTIFICATION  
SYSTEM

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*Inter Partes* Review No.: IPR2016-00450

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**PATENT OWNER'S PRELIMINARY RESPONSE**

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## I. INTRODUCTION

In accordance with 37 C.F.R. § 42.107, Patent Owner TeleSign Corporation (“Patent Owner”) submits this preliminary response to the Petition filed by Twilio Inc. (“Petitioner”) requesting *inter partes* review of claims 1-10, 13 and 17-22 of U.S. Patent No. 8,462,920 (the “920 Patent”).

The Board should deny Twilio’s Petition because it fails to show a reasonable likelihood that Petitioner will prevail with respect to at least one challenged claim. The Petition suffers from three independently fatal flaws, each of which is a sufficient basis to deny institution of *inter partes* review. First, the Petition relies on improper claim constructions. This infects the Petition’s prior-art analysis. Second, the Petition has not shown that the cited references, alone or in combination, teach<sup>1</sup> or suggest all elements of the claims. For elements not taught in the primary reference, the Petition does not provide a sufficient rationale for modifying the primary reference to include the missing features. The main limitations of independent claim 1 that are not taught include 1) “establishing a notification event associated with the registrant,” 2) identifying an occurrence of the established notification event,” 2) “after identifying the occurrence of the

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<sup>1</sup> Uses herein of “teach”/“teaches” means “teach or suggest”/“teaches or suggests” even if “or suggest” is occasionally omitted.

established notification event, re-verifying the registrant electronic contact,” and 4) “a verification **and notification**<sup>2</sup> process.” Finally, the Petition detrimentally depends on a declaration (the “Shamos Declaration”) that is entitled to little or no weight. The Petition lacks independent evidentiary support. And without the Shamos Declaration, it cannot support the conclusory statements made.

## II. MANDATORY DISCLOSURE UNDER 37 C.F.R. §42.8(b)(2)

The ‘920 Patent is asserted against Petitioner in concurrent litigation styled *TeleSign Corp. v. Twilio Inc.*, No. 2:15-cv-03240. Co-pending petitions for *inter partes* review in IPR No. 2016-00451 and IPR No. 2016-00360, also filed by Petitioner, identified this Petition as a related matter. Patent Owner does not foresee at this time that the decision in this Petition will affect, or be affected by, these other Petitions.

## III. OVERVIEW

### A. The ‘920 Patent.

One issue addressed by the ‘920 Patent is preventing fraud and identity theft by verifying the identity of registrant users—verifying that users are who they say

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<sup>2</sup> All bolding, italics, and other emphasis appearing in any quoted matter has been added by the Patent Owner unless indicated otherwise. Thus, we do not respectively indicate “emphasis added” throughout this document.

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