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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROTHSCHILD MOBILE IMAGING INNOVATIONS, LLC
Petitioner

v.

MITEK SYSTEMS, INC.
Patent Owner

Case IPR2016-00457
Patent 8,379,914

**Patent Owner's Preliminary Response
to Petition for *Inter Partes* Review
of U.S. Patent No. 8,379,914**

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I. Introduction

In accordance with 35 U.S.C. § 313 and 37 C.F.R. § 42.107, Patent Owner Mitek Systems, Inc. (“Mitek” or “Patent Owner”) respectfully submits this Preliminary Response to the Petition for *Inter Partes* Review of Mitek’s U.S. Patent No. 8,379,914 (“the ’914 patent”) filed by Rothschild Mobile Imaging Innovations, LLC. (“RMII” or “Petitioner”). Mitek requests that the Board deny institution of the *inter partes* review for at least the following reasons.

First, the prior art on which RMII relies to establish the unpatentability of challenged claims 1-7 and 9-10 (the “Challenged Claims”) fails to recite each and every limitation of any Challenged Claim. Specifically, the prior art fails to recite at least (i) a “mobile device,” recited in all Challenged Claims; (ii) “identifying an address of a biller on the remittance coupon by comparing address content in the extracted content with an address database,” recited in all Challenged Claims; (iii) “determining biller profile information of the biller, including an identity of the biller on the remittance coupon, by comparing the identified address of the biller with a database of biller profile,” recited in all Challenged Claims; and (iv) “reading a code line on the remittance coupon and correcting a scale of the remittance coupon based on a size of the code line,” recited in claim 2. As a result, Petitioner has not met its burden of demonstrating a reasonable likelihood of prevailing in proving the unpatentability of any Challenged Claim. *Second*,

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