UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ACTIVISION BLIZZARD, INC., ELECTRONIC ARTS INC., TAKE-TWO INTERACTIVE SOFTWARE, INC., 2K SPORTS, INC., ROCKSTAR GAMES, INC., Petitioners

v.

ACCELERATION BAY, LLC, Patent Owner

Case No. IPR2016-00726 Patent 6,910,069 B1

PATENT OWNER PRELIMINARY RESPONSE TO PETITION PURSUANT TO 37 C.F.R. §42.107

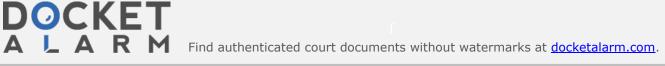


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	A. Ground 1: Claims 1–3, 7–9, and 11–17 are Patentable Over Obrazcka in view of Denes and Shoubridge					
		1.	Obraczka in view of Denes and Shoubridge Fails to Disclose "a seeking [participant/node] [that] contacts a fully connected portal [computer/node]" (claims 1 and 14)			
		2.	Obraczka in view of Denes and Shoubridge Fails to Disclose "a fully connected portal [computer/node] which in turn sends an edge connection request to a number of randomly selected neighboring [participants/nodes] to which the seeking [computer/node] is to connect" (claims 1 and 14)19			
		3.	The Petition Provides Inadequate Motivation to Combine the Obraczka, Denes, and Shoubridge References			
	B. Ground 2: Claims 4–6 and 10 are Patentable Over Obrazcka in view of Denes Shoubridge, and Valiant					
		1.	Obraczka in view of Denes, Shoubridge, and Valiant Fails to Disclose "wherein the randomly selecting of a pair includes sending a message through the network on a randomly selected path" (claim 4)			
		2.	Obraczka in view of Denes, Shoubridge, and Valiant Fails to Disclose "wherein when a participant receives			

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	the message, the participant sends the message to a randomly selected participant to which it is connected"	
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PATENT OWNER'S EXHIBIT LIST

Exhibit Number	Description
Ex. 2001	Declaration of Michael Goodrich, Ph.D.

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