UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY

Petitioner

v.

TRILOGY DEVELOPMENT GROUP, INC.

Patent Owner

Case IPR2016-01012
Patent 7,882,057

PATENT OWNER TRILOGY DEVELOPMENT GROUP, INC.'S

PRELIMINARY RESPONSE

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B. Ford does not show that the cited references teach "processing of each sub-query using at least one

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configuration sub-model per sub-query" as recited in every independent claim. 47

C. Ford does not show that the cited references teach that "each configuration sub-model includes data to define compatibility relationships between parts" as recited in every independent claim. 36

D. Ford does not show that the cited references teach that "each configuration sub-model collectively models the configurable product" as recited in every independent claim. 43

IV. Ford does not show that the cited references suggest every feature of the dependent claims. 48

A. Ford does not show that the cited references teach "using different configuration sub-models until a configuration validation answer can be determined" as recited in claims 4, 20, and 34. 49

B. Ford does not show that the cited references teach that "at least two sub-queries include overlapping information" as recited in claims 6, 22, and 36 52

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1. Ford does not show that the cited references teach "dividing a consolidated configuration model . . . in accordance a predetermined data structure." 55

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EXHIBIT LIST

Exhibit No.	Description
2001	Excerpts from *Microsoft Dictionary of Computer Terms,* Fifth Edition (2002).
2002	Excerpts from *IBM Dictionary of Computer Terms,* Tenth Edition (1994).
2003	Excerpts from *Webster's New World Dictionary of Computer Terms,* Sixth Edition (1997).
2004	Versata website, "About Us", available at http://cpq.versata.com/about-us.
2005	Ford Starts Firm to Manage Its Web Sites, ComputerWorld, Feb. 28, 2008, available at http://www.computerworld.com/article/2592825/it-management/ford-starts-firm-to-manage-its-web-sites.html.
2006	McCartney, Laton, "Trilogy Making A Name For Itself," ZDNet, July 28, 2000.
2007	Versata Software Inc. Company Report, May 18, 2016, via Thomson Reuters.
2008	Field, Tom, *Suit Yourself,* CIO Magazine, Apr. 15, 1997, Vol. 10, p. 108.
2009	"Ford and Trilogy Launch Web Company - Information Week," InformationWeek News, February 23, 2000, available at http://www.informationweek.com/ford-and-trilogy-launch-web-company/d/d-id/1008183.
2010	Plaintiff's Original Complaint for Damages and Injunctive Relief, filed in *Versata Development Group v. Ford Motor Company,* Case No. 4:15-cv-00316, (TXED), filed May 7, 2015; 32 pages.

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I. Introduction

Patent Owner Trilogy Development Group, Inc.[1] and Petitioner Ford Motor Company had 19-year business relationship. During most of this time, Ford licensed Trilogy's patented Automotive Configuration Management (ACM) software and used this software as the backbone of its worldwide data infrastructure. (Ex. 2010, Complaint, pp. 1-2, in *Versata Development Group, Inc. et al. v. Ford Motor Co.*, (E.D. Tex. filed May 7, 2015).) In 2011, to avoid paying licensing fees, Ford began a project to replace ACM with internally-developed software. Trilogy contends that this replacement software is a copy of ACM. (*See generally* Ex. 2010.)

Now, Ford requests *inter partes* review on Trilogy's U.S. Patent No. 7,882,057 ("the '057 patent"). The '057 patent relates to database techniques to describe different ways that a product, such as an automobile, can be configured. This Petition is one of two that Ford filed on the '057 patent, each directed to a

[1] Trilogy, Inc. acquired Versata, Inc. in 2006, at which point portions of Trilogy were merged with Versata, Inc. as part of a reorganization. (*See* Ex. 2007, Versata Company Report.) For convenience, herein Patent Owner refers to both companies as Trilogy.

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