UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RUBICON COMMUNICATIONS, LP Petitioner,

V.

LEGO A/S
Patent Owner.

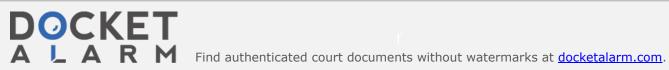
Case IPR2016-01187 Patent 8,894,066

PATENT OWNER'S PRELIMINARY RESPONSE



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	A.	Rub	icon Relied on Inadmissible and/or Improper References				
		a.	Rubicon did not submit references.	26			
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		c.	Rubicon did not show references are "printed publications."	30			
		d.	Rubicon failed to prove references are "prior art."	31			
		e.	Rubicon submitted an improper reference, previously considered the Office.	•			
	B.		n If Rubicon's Cited References Were Admissible, They Do Not				
			ablish a Prima Facie Case of Anticipation and/or Obviousness aga				
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EXHIBITS

Exhibit No.	Exhibit Description
2010	Rubicon's letter to LEGO dated June 27, 2016
2002	Rubicon's e-mail to the Board sent on July 20, 2016
2003	Def.'s First Am. Answer, Defenses, and Countercls., <i>LEGO</i>
	System A/S v. Rubicon Commc'ns, LP dba Smallworks and
	Smallworks, LLC, No. 15-823 (D. Conn. Sept. 11, 2015)
2004	Mot. for Leave to Amend Compl. to Add Additional Party Def.
	and to Extend the Time for Pl. to Further Amend and Join
	Parties, LEGO System A/S v. Rubicon Commc'ns, LP dba
	Smallworks and Smallworks, LLC, No. 15-823 (D. Conn. Oct.
	14, 2015)
2005	Order Granting [29] Motion to Amend Compl. and to Extend
	Deadlines, LEGO System A/S v. Rubicon Commc'ns, LP dba
	Smallworks and Smallworks, LLC, No. 15-823 (D. Conn. Oct.
	22, 2015)
2006	Declaration of Elizabeth B. Knight
2007	Curriculum Vitae of Elizabeth B. Knight
2008	Pl. LEGO System A/S's Opening Claim Construction Br.,
	LEGO System A/S v. Rubicon Commc'ns, LP dba Smallworks
	and Smallworks, LLC, No. 15-823 (D. Conn. Mar. 25, 2016)
2009	Declaration of Andrew M. Riddles



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CAE Screenplates Inc. v. Heinrich Fiedler GmbH, 224 F.3d 1308 (Fed. Cir. 2000)	24
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Cisco Systems, Inc. v. Constellation Techs., IPR2014-00871, Paper 12 (P.T.A.B. Dec. 19, 2014)	31
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Graham v. John Deere Co., 383 U.S. 1 (1966)	37
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