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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GLOBAL TEL*LINK CORPORATION,
Petitioner,

v.

SECURUS TECHNOLOGIES, INC.,
Patent Owner.

Case IPR2016-01220
Patent 9,007,420 B1

PATENT OWNER'S RESPONSE

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Patent Trial and Appeal Board
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PATENT OWNER'S EXHIBIT LIST

Exhibit No.	Description
2001	Dictionary of Computer and Information Technology 272 (2013)
2002	Declaration of Jeffrey R. Bragalone - PHV Motion
2003	Declaration of Daniel F. Olejko - PHV Motion
2004	Declaration of Patent Owner's Expert Dr. Ioannis A. Kakadiaris
2005	Webster's Third New International Dictionary, 22
2006	Feb. 22, 2017 Deposition Transcript of Homayoon Beigi, D.Eng.Sc
2007	Curriculum Vitae of Anshuman Razdan
2008	Curriculum Vitae of Gerald Farin
2009	Xerxes Mazda & Fraidoon Mazda, The Focal Illustrated Dictionary of Telecommunications 555 (1999)

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I. INTRODUCTION

Pursuant to 35 U.S.C. § 316(a)(8) and 37 C.F.R. § 42.120, Patent Owner Securus Technologies, Inc. ("Securus") hereby responds to the Petition (Paper 2) ("Petition") filed by Global Tel*Link Corporation ("GTL" or "Petitioner") challenging claims 1-21 of U.S. Patent No. 9,007,420 (Ex. 1001) (the "'420 Patent") with respect to Grounds 1 and 2 which the Board instituted *Inter Partes* Review as summarized below:

Ground	References Combined	Independent Claims	Dependent Claims
1	Torgersrud and Kenoyer	1, 11	2-9, 12-19
2	Torgersrud, Kenoyer, and Zhang	21	10, 20

Petitioner bears "the burden of proving a proposition of unpatentability by a preponderance of the evidence." 35 U.S.C. § 316(e). For the reasons set forth herein, Petitioner has failed to meet its burden to show by a preponderance of the evidence because (1) Petitioner's grounds of unpatentability rely on incorrect claim constructions; (2) the prior art lacks material claim limitations; and (3) one having ordinary skill in the art would not have been motivated to combine references as Petitioner suggests; and (4) Petitioner uses impermissible hindsight reconstruction by failing to consider the differences between the claims and the prior art and failing to analyze the claims as a whole.

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