UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Twilio Inc.
Petitioner

v.

TeleSign Corporation
Patent Owner

Patent No. 9,300,792
(filed April 3, 2015, issued March 29, 2016)

Title: REGISTRATION, VERIFICATION AND NOTIFICATION SYSTEM

Inter Partes Review No. IPR2016-01688

PATENT OWNER'S RESPONSE

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Table of Contents

1. Overview..... 1
2. The '792 Patent..... 2
   2(A). Problems Addressed by the '792 Patent.....3
   2(B). Solutions.....5
3. Legal Authority..... 7
   3(A). That references merely *could be* combined is insufficient to show obviousness based on those references.....7
   3(B). Hindsight is improper.....8
   3(C). Failure to articulate an adequate obviousness rationale is reversible error. 11
   3(D). In *inter partes* review, the Petitioner's burden to show obviousness never shifts to the Patent Owner and the Petition must be complete.....12
   3(E). In *inter partes* review, Patent Owner's evidence is not evaluated merely for its "knockdown" ability; rather, it is to be laid alongside Petitioner's and assessed in kind. 12
4. Arguments herein are applicable to like elements in claims 1 and 10. 14
5. Acknowledgment of the Board's claim construction of "notification event" 14
6. Bennett does not teach the "notification event" limitations. 15
7. First argument: The Petition fails to make out a prima facie case of obviousness because it does not show that the "action" limitations are taught in the prior art. 17
8. Second argument: the Petition fails to make out a prima facie case of obviousness because it fails to show notification events "associated with actions that require user acknowledgement" is in the art of record. 26

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9. Third argument: The Petition fatally relies on Bennett alone to attempt to show the last element of claim 1, setting forth no argument at all that Campbell purportedly teaches "receiving, from the user, an acknowledgement of an action associated with the established notification event." 30

9(A). Argument. 30

9(B). Petitioner is not allowed to make additional arguments outside of the Petition to support its *prima facie* case. 31

9(C). Additional arguments necessary to support Petitioner's prima face case not in the Petition may not be set forth. 32

10. Fourth Argument: Skilled artisans would not have been motivated to combine the teachings of Bennett and Campbell, and thus, Petitioner has failed to show that any notification-event limitation is taught. 33

10(A). Supplementing Bennett's code message with Campbell's contact instructions would expose users to security risks. 33

10(B). Bennett's disclosure of "other information" in the message does not refer to a "word-based notification" having contact instructions. 36

10(C). Additional reasons why Campbell is not properly combinable with Bennett. 38

11. Conclusion. 40

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Patent Owner's Updated List of Exhibits:

Exhibit Number	Document
2001	BBC News Article, "Tinder accounts spammed by bots masquerading as singles", http://www.bbc.com/news/26850761, last accessed Nov. 29, 2016.
2002	Technology Review Article, "Fake Persuaders", https://www.technologyreview.com/s/535901/fake-persuaders/, last accessed Nov. 29, 2016.
2003	Certified copy of the file wrapper and contents of the application (14/678,815) leading to U.S. Patent No. 9,300,792.
2004	Decision denying institution for IPR2016-00451.
2005	Decision denying institution for IPR2016-00450.
2006	"Security Engineering" by Ross Anderson, Second Edition, 2008.
2007	Bruce Schneier, Crypto-gram, October 15, 2000.
2008	Declaration or Dr. Seth Nielson
2009	C.V. of Dr. Seth Nielson
2010	List of Materials Considered by Dr. Seth Nielson

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EMPHASIS IN QUOTATIONS

Unless otherwise indicated, any and all emphasis (italics, underlining, bolding) appearing in all quotations herein has been added. For readability (reducing parenthetical notices), this is not always indicated.

"Teach" means "teach or suggest."

Patent Owner's usage of "teach" herein means "teach or suggest," which is generally abbreviated to just "teach" for readability.

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