UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD APPLE, INC., Petitioner v. REALTIME DATA, LLC D/B/A/ IXO, Patent Owner Case IPR2016-01739 Patent 8,880,862

PATENT OWNER REALTIME DATA, LLC D/B/A IXO'S RESPONSE



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	A.	Each Ground is Defective Because Petitioner's Combinations Fail to Disclose Claim 5's "Updating the Boot Data List."
		1. Settsu Does Not Teach or Suggest "Updating the Boot Data List." 24
		2. Settsu in View of Zwiegincew Does Not Render Obvious "Updating the Boot Data List."
	В.	Each Ground is Defective Because Petitioner's Combinations Do Not Render Obvious Claim 98's "Disassociating Non-Accessed Boot Data from the Boot Data List."
	C.	Each Ground is Defective Petitioner's Combinations Do Not Render Obvious Claim 112's "Updating the Boot Data List" in Response to the "Utilizing" Step
	D.	Each Ground is Defective Because Neither Dye Nor Zwiegincew Teaches Claim 46's "Plurality of Encoders."



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