Paper No. ___
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SECURENET TECHNOLOGIES, LLC,
Petitioner,

v.

ICONTROL NETWORKS, INC.,
Patent Owner.

Case IPR2016-01920
Patent No. 8,473,619

PATENT OWNER'S PRELIMINARY RESPONSE PURSUANT TO 37 C.F.R. § 42.107

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I. STATEMENT OF PRECISE RELIEF REQUESTED

Petitioner SecureNet Technologies, LLC ("Petitioner") filed a petition ("Pet.," PN 1) for *inter partes* review ("IPR") of claims 17-18, 20-22, 29-31, 33, 35-41, 48-53, and 58 of U.S. Patent No. 8,473,619 ("'619 patent," Ex. 1001). Patent Owner Icontrol Networks, Inc. ("Icontrol") requests that the Board deny institution because Petitioner has not met its burden of showing it has a reasonable likelihood of prevailing on at least one claim with respect to any of its proposed grounds of patentability.

II. INTRODUCTION

Petitioner's reliance on U.S. Patent Pub. No. 2004/0260427 ("Wimsatt," Ex. 1004) suffers from a fundamental problem: Wimsatt is a locally distributed system with many control panels and many devices and subsystems that are arranged in a manner completely different from that of the '619 patent, which claims an integrated system with a gateway that communicates with security components, network devices, and a server. *Compare* Ex. 1004 Fig. 1 *with* Ex. 1001 cl. 1. This basic disconnect between Wimsatt and the '619 patent claims results in a ripple effect of problems with the petition throughout, causing Petitioner to mismatch Wimsatt's inadequate disclosures with the '619 patent's claim elements. Further compounding these problems is Petitioner's reliance on U.S. Patent No. 6,580,950 ("Johnson," Ex. 1005), a reference that teaches a system that is incompatible with

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and taught away by Wimsatt, and on U.S. Patent No. 4,951,029 ("Severson," Ex. 1006), which is a primitive security system that lacks any of the claimed features of the '619 patent. Indeed, any one of the following problems prevents the Board from instituting IPR as to the challenged claims of the '619 patent:

First, the combination of Wimsatt, Severson, and Johnson does not teach automatically discovering components of a security system. *See infra* Section V.A.1. Petitioner conflates the difference between discovering a system versus discovering that system's components, and improperly relies on prior art disclosure of interrogation (not discovery) that occurs after components have been manually coupled and programmed. *See id.*

Second, the proposed combination of Wimsatt, Severson, and Johnson does not maintain objects at a security server. *See infra* Section V.A.2. Petitioner's reliance on Johnson's "icons" for this point is unexplained and unsupported by the reference, which does not disclose the purpose of the icons let alone disclose any corresponding aspect of the data structure in Johnson's server that would be relevant to the '619 patent claims. *See id.*

Third, the petition fails to demonstrate that the proposed combination of Wimsatt, Severson, and Johnson generates processed data in the manner claimed by the '619 patent. *See infra* Section V.A.3. Merely stating that a "processor" is disclosed does not satisfy Petitioner's burden to explain whether and how the

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