### UNITED STATES PATENT AND TRADEMARK OFFICE

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### BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY

Petitioner

v.

TRILOGY DEVELOPMENT GROUP, INC.

Patent Owner

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Case IPR2017-00150 Patent 7,882,057

## PATENT OWNER TRILOGY DEVELOPMENT GROUP, INC.'S PRELIMINARY RESPONSE

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	A.	For more than a year, Versata and Ford have continuously been involved in a patent-infringement dispute				
	B.	Ford's IPR petition is time barred under 35 U.S.C. § 315(b).				
	C.	The Board, in its discretion, should deny institution because Ford improperly used its first petition as a roadmap for drafting its second				
III.	TFC	-	ERVIEW			
	A.	Versata is a pioneer in configuration technology, and the '057 patent represents a significant advance				
	В.	Overview of the '057 Patent				
	C.	Overview of Loomans				
	D.	Overview of Stahl				
IV.	ARGUMENT					
	A.	Ford does n	ot show that the cited references teach or ry claim feature			
		"divi that ' repre	does not show that the cited references teach ding one or more configuration queries" such 'the multiple configuration sub-queries sent the one or more configuration queries" as ed in every independent claim.	35		
		a.	Stahl's disclosure that "we can interpret the different nodes of the query" does not disclose the claimed "dividing."	leaf 37		
		<b>b.</b>	Stahl does not disclose dividing such that "the multip configuration sub-queries represent the one or more configuration queries" as claimed.			
		с.	Ford provides no reason explaining why a skilled arti would incorporate Stahl's "interpretation" into Loom system.	ans'		



		2.	Ford does not show that the cited references teach that "each configuration sub-model includes data to define compatibility relationships between parts" as recited in every independent claim.	47
		3.	Ford does not show that the cited references teach that "each configuration sub-model collectively models the configurable product" as recited in every independent claim.	53
		4.	Ford does not show that the cited references teach "processing of each sub-query using at least one configuration sub-model per sub-query" as recited in every independent claim.	56
			Board should reject Ford's means-plus-function ysis.	
	C.	neve	's obviousness analysis is inadequate, because Ford rascertains the differences between the references he claims	59
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