

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BITDEFENDER INC.
Petitioner

v.

UNILOC USA, INC.
Patent Owner

Case IPR2017-01315
Patent 6,510,466

Title: Methods, Systems and Computer Program Products for Centralized
Management of Application Programs on a Network

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

UNDER 37 CFR §42.100 *ET SEQ.*

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I. INTRODUCTION

Patent Owner's Response (Paper 11, "POR") fails to rebut Petitioner's showing that the instituted claims are obvious in light of *Kasso*, *Raduchel* and *Olsen*.

In its POR, Patent Owner reiterates its challenge to Petitioner's reasoning regarding the limitation "receiving at the server a login request from a user at the client," found in claim 1. Patent Owner does not raise, and thus has waived, any other challenge as to claim construction, other limitations of claim 1, or any of the dependent claims.

The POR does not rely on any new evidence. The POR relies on Dr. DiEuliis' Expert Declaration (Ex. 2001) filed with the Patent Owner's Preliminary Response (Paper 6, "POPR") and previously considered by the Board. Patent Owner did not submit a new expert declaration with its POR, and did not cross-examine Petitioner's expert witness.

Patent Owner's challenge, in broadly the same form, was previously considered and rejected by the Board. Contrary to Patent Owner's conclusory contentions, the Petition (Paper 1) provided evidence and reasoning to support a finding of obviousness for the challenged claims, and the Board should find claims 1, 2 and 7-9 of the '466 patent invalid for obviousness.

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