

# SERVER-GROUP MESSAGING SYSTEM FOR INTERACTIVE APPLICATIONS

*Riot Games, Inc. and Valve Corp. v. Paltalk  
Holdings, Inc.*, IPR2018-00129, IPR2018-  
00130, IPR2018-00131, IPR2018-00132

U.S. Patent Nos. 5,822,523 and 6,226,686



Oral Argument – February 13, 2019

# Introduction

- *Inter Partes* Review was instituted for:
  - IPR2018-00129 (523 Patent): Claims 1-10, 16-18, 31-37, 41, 42, and 44-47 as unpatentable under 35 U.S.C. § 103 over Aldred (Ex. 1009) and RFC 1692 (Ex. 1010), Claims 38-40 as unpatentable under 35 U.S.C. § 103 over Aldred, RFC 1692, and RFC 1459 (Ex. 1025), and Claim 43 as unpatentable under 35 U.S.C. § 103 over Aldred, RFC 1692, and Denzer (Ex. 1014);
  - IPR2018-00130 (523 Patent): Claims 1, 15, and 19-27 as unpatentable under 35 U.S.C. § 103 over Aldred and RFC 1692, and Claims 11-15, 23, and 27-30 as unpatentable under 35 U.S.C. § 103 over Aldred, RFC 1692, and Ulrich (Ex. 1012);
  - IPR2018-00131 (686 Patent): Claims 1-4, 7-21, 28-30, 34, 35, 39, 40, 47-49, 53, 54, 56, 57, 64-66, and 70 as unpatentable under 35 U.S.C. § 103 over Aldred and RFC 1692, and Claims 31-33, 50-52, and 67-69 as unpatentable under 35 U.S.C. § 103 over Aldred, RFC 1692, and RFC 1459; and
  - IPR2018-00132 (686 Patent): Claims 1, 3, 7, 12, 18, 26, 27, 45, 46, 62, and 63 as unpatentable under 35 U.S.C. § 103 over Aldred and RFC 1692, Claims 22-27, 41-46, and 58-63 as unpatentable under 35 U.S.C. § 103 over Aldred, RFC 1692, and Ulrich, and Claims 36 and 55 as unpatentable under 35 U.S.C. § 103 over Aldred, RFC 1692, and Denzer.

# Introduction

- **Issues**

1. Petitioner has not sufficiently demonstrated a POSITA would have been motivated to combine Aldred (Ex. 1009) and RFC 1692 (Ex. 1010) – because such a combination would render Aldred unsatisfactory for its intended purpose
2. Claim Construction of “Aggregated Payload” and “Aggregated Message” – Claim 1 (523 Patent); Claims 1, 3, 7, 12, and 18 (686 Patent)

For convenience to both the parties and the Board, unless otherwise noted, citations used by Patent Owner in these demonstrative exhibits refer to papers filed in IPR2018-00129.

# CLAIM CONSTRUCTION



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## Patent Owner's Proposed Claim Construction:

- **“Aggregated Message”** (“Server Message” in Claim 18 of 686 Patent)
  - “One or more messages containing a single transport layer message header, destination data, and data items from an aggregated payload.” (PO Resp., Paper 22, at 4)
- **“Aggregated Payload”** (“aggregating said payload portions” in Claim 3 of 686 Patent) (“aggregating said payload portion with the payload portion of a second host message” in Claim 18 of 686 Patent)
  - “A collection of two or more data items that does not include transport layer headers.” (PO Resp., Paper 22, at 13)

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