UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RIOT GAMES, INC.,
Petitioner,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

Case IPR2018-00131
Patent 6,226,686

PATENT OWNER'S RESPONSE TO PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,226,686

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   a. Petitioner has failed to demonstrate that RFC 1692 discloses or suggests "aggregating said payload portions of said host messages . . . to create an aggregated payload" (Claim 1 and 3); "aggregating said payload portions of said messages . . . to create an aggregated payload" (Claim 7 and 12); and "aggregating said payload portion with the payload portion of a second host message" (Claim 18) 33
   b. Petitioner has failed to demonstrate that RFC 1692 discloses or suggests "forming an aggregated message using said aggregated payload" (Claims 1, 12); "create an aggregated message" (Claim 3); "said aggregated message" (Claim 7); and "forming a server message . . ." (Claim 18) 43
2. Aldred in view of RFC 1692 does not render obvious Claims 30, 34, 35, 49, 53, 54, 66, and 70 50

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3. Aldred in view of RFC 1692 does not render obvious Claims 2, 4, 8-11, 13-17, 19-21, 28, 29, 39, 40, 47, 48, 56, 57, 64, and 65 53

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LIST OF EXHIBITS

Exhibit 2002:	Declaration of Dr. Kevin C. Almeroth
Exhibit 2003:	Curriculum Vitae of Dr. Kevin C. Almeroth
Exhibit 2004:	Transcript of Deposition of Dr. Steve White

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I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.120, Patent Owner Paltalk Holdings, Inc. ("Paltalk" or "Patent Owner") respectfully submits this Patent Owner's Response, to the Petition for *Inter Partes* Review (Paper 1) filed by Riot Games, Inc. ("Petitioner") concerning U.S. Patent No. 6,226,686 ("the '686 Patent") (Ex. 1002). The Patent Trial and Appeal Board ("the Board") instituted this proceeding on May 15, 2018, with respect to (1) Claims 1-4, 7-21, 28-30, 34, 35, 39, 40, 47-49, 53, 54, 56, 57, 64-66, and 70 of the '686 Patent under Petitioner's alleged 35 U.S.C. § 103 combination of International Publication No. WO 94/11814 to Aldred ("Aldred") (Ex. 1009) and "Transport Multiplexing Protocol (TMux)," RFC 1692 ("RFC 1692") (Ex. 1010), and (2) Claims 31-33, 50-52, and 67-69 of the '686 Patent under Petitioner's alleged § 103 combination of Aldred, RFC 1692, and "Internet Relay Chat Protocol," RFC 1459 ("RFC 1459") (Ex. 1025). Patent Owner addresses each of these grounds in the present Response and requests that the Board hold the claims of the '686 Patent valid.

II. CLAIM CONSTRUCTION

The '686 Patent has expired. Therefore, the claims should be given their ordinary and accustomed meaning as understood by one of ordinary skill in the art consistent with the standard expressed in *Phillips v. AWH Corp.*, 415 F.3d 1303, 1312–13 (Fed. Cir. 2005) (en banc). The ordinary meaning of a term may be

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