UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RIOT GAMES, INC.,
Petitioner,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

Case IPR2018-00132
Patent 6,226,686

PATENT OWNER'S PRELIMINARY 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 Aldred discloses, either inherently or obviously, messages containing a portion for identifying a message group 21

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i. Petitioner has failed to show that Aldred discloses or suggests "messages contains . . . a portion that is used to identify said message group" (Claims 1, 3, 7 and 18); and "messages contains . . . a portion that is used to identify said first message group" (Claim 12) 22

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LIST OF EXHIBITS

Exhibit 2001:	Declaration of Nancy Miracle

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