

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RIOT GAMES, INC., and
VALVE CORP.,
Petitioners,

v.

PALTALK HOLDINGS, INC.,
Patent Owner.

Case No. IPR2018-00132¹
U.S. Patent No. 6,226,686 & 6,226,686 C1

PETITIONERS' REPLY

¹ Case IPR2018-01243 has been joined with this proceeding.

TABLE OF CONTENTS

I.	Introduction.....	1
II.	The Challenged Claims are Unpatentable	2
	A. The Combination of Aldred and RFC 1692 was Obvious.....	2
	i. RFC 1692 Does Not Reorder TCP Segments.....	3
	ii. Aldred Maintains the Order of Serialized Updates.....	5
	iii. Aldred Does Not Require the Use of Large Packets	7
	iv. The Techniques of Aldred and RFC 1692 are Complementary .	8
	B. Aldred and RFC 1692 Disclose the Claimed “Aggregated Message,” “Server Message,” and “Aggregated Payload” (All Claims).....	12
	i. There is No Basis for PalTalk’s “Transport Layer” Header Requirement.....	13
	ii. The ’686 Patent’s Transport <i>Level</i> Protocol Disclosure Cannot Support a “Transport <i>Layer</i> ” Requirement.....	18
	iii. PalTalk’s Construction Would Read Out a Preferred Embodiment.....	20
	iv. The ’686 Patent Does Not Disclaim Including “Transport Layer” Headers	21
	C. Claims 22, 41, and 58 are Unpatentable	23
	D. Claims 23, 42, and 59 are Unpatentable	25
	E. Claims 24, 25, 43, 44, 60, and 61 are Unpatentable	27
	F. Remaining Claims	27
III.	Conclusion	28
	Exhibit List	29

Certificate Of Compliance32
Certificate Of Service.....33

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Accent Packaging, Inc. v. Leggett & Platt, Inc.</i> , 707 F.3d 1318 (Fed. Cir. 2013)	21
<i>Apple Inc. v. VirnetX Inc.</i> , IPR2014-00237, Paper 41 (PTAB May 11, 2015)	8
<i>Bristol-Myers Squibb Co. v. Teva Pharms. USA, Inc.</i> , 752 F.3d 967 (Fed. Cir. 2014)	10
<i>Dealertrack, Inc. v. Huber</i> , 674 F.3d 1315 (Fed. Cir. 2012)	21
<i>In re Fulton</i> , 391 F.3d 1195 (Fed. Cir. 2004)	9, 10
<i>i4i Ltd. P'ship v. Microsoft Corp.</i> , 598 F.3d 831 (Fed. Cir. 2010)	22
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	9, 11
<i>In re Kubin</i> , 561 F.3d 1351 (Fed. Cir. 2009)	11
<i>Liebel-Flarsheim Co. v. Medrad, Inc.</i> , 358 F. 3d 898 (Fed. Cir. 2004)	16
<i>In re Mouttet</i> , 686 F.3d 1322 (Fed. Cir. 2012)	24
<i>PalTalk Holdings, Inc. v. Microsoft Corp.</i> , C.A. 2:06-cv-367-DF, Dkt. 55	17
<i>PalTalk Holdings, Inc. v. Riot Games, Inc.</i> , C.A. 1:16-cv-1240-JFB-SRF, Dkt. 59, 64, 67, 69	12
<i>PalTalk Holdings, Inc. v. Sony Comput. Ent. Inc.</i> , C.A. 2:09-cv-274-DF, Dkt. 209 (E.D. Tex. Oct. 25, 2010).....	17

Phillips v. AWH Corp.,
415 F.3d 1303 (Fed. Cir. 2005)13, 16

Thorner v. Sony Comput. Entm't Am. LLC,
669 F.3d 1362 (Fed. Cir. 2012)21

Vivid Techs., Inc. v. Am. Sci. & Eng'g, Inc.,
200 F.3d 795 (Fed. Cir. 1999)12

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.