

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.
Petitioner,

v.

UNIVERSAL SECURE REGISTRY LLC
Patent Owner

Case IPR2018-00809
U.S. Patent No. 9,530,137

**PATENT OWNER'S PRELIMINARY RESPONSE
PURSUANT TO 35 U.S.C. § 313 AND 37 C.F.R. § 42.107**

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. OVERVIEW OF THE '137 PATENT	4
A. The '137 Patent Specification	4
B. The '137 Patent Claims	7
C. Prosecution History of the '137 Patent	9
III. OVERVIEW OF THE ASSERTED PRIOR ART	10
A. Jakobsson.....	10
B. Maritzen.....	11
C. Schutzer	12
D. Niwa	13
IV. LEVEL OF ORDINARY SKILL IN THE ART	13
V. CLAIM CONSTRUCTION	14
A. “The One Or More Signals” (All Challenged Claims)	14
VI. THE PETITION FAILS TO DEMONSTRATE A REASONABLE LIKELIHOOD THAT ANY CLAIM IS INVALID BASED ON JAKOBSSON IN VIEW OF MARITZEN (GROUND 1).....	17
A. Petitioner Fails To Show Any Disclosure Of Transmitting And Processing “The One Or More Signals” (Limitations 1[f], 1[h], And 12[f]).....	19
B. Petitioner Has Failed To Demonstrate Jakobsson Discloses Limitations 1[i] and 12[i]	23
C. A POSITA Would Not Be Motivated To Combine Jakobsson With Maritzen.....	27
VII. GROUND 3 IS MOOT BECAUSE CLAIMS 8 AND 11 HAVE BEEN CANCELLED	32
VIII. CONCLUSION.....	33

TABLE OF AUTHORITIES

Page

CASES

C&D Zodiac, Inc. v. B/E Aerospace, Inc.,
Case No. IPR2014-00727 (P.T.A.B. October 29, 2014).....23

Cheese Sys. v. Tetra Pak Cheese & Powder Sys.,
725 F.3d 1341 (Fed. Cir. 2013)28

Commvault Systems, Inc. v. Realtime Data LLC,
Case No. IPR2017-02006 (P.T.A.B. March 29, 2018)23

Cuozzo Speed Techs., LLC v. Lee,
136 S. Ct. 2131 (2016).....14

Google Inc. v. SimpleAir, Inc.,
|Case CBM2015-00019 (PTAB May 19, 2015)..... 12, 32

Kinetic Concepts, Inc. v. Smith & Nephew, Inc.,
688 F.3d 1342 (Fed. Cir. 2012)29

KSR Int’l Co. v. Teleflex, Inc.,
550 U.S. 398 (2007).....28

Light Guard Systems, Inc. v. Spot Devices, Inc.,
2012 WL 2131943 (D. Nev. 2012).....15

Medgraph, Inc. v. Medtronic, Inc.,
843 F.3d 942 (Fed. Cir. 2016)15

Merck & Co., Inc. v. Teva Pharm. USA, Inc.,
395 F.3d 1364 (Fed.Cir.2005)25

Square, Inc. v. Cooper,
IPR2014-0015 (May 15, 2014).....32

STATUTES

37 C.F.R. § 42.10014

EXHIBIT TABLE

Exhibit #	Description
2001	Declaration of Markus Jakobsson in Support of Patent Owner's Preliminary Response
2002	Curriculum Vitae of Markus Jakobsson
2003	USR Disclaimer Filed July 6, 2018

I. INTRODUCTION

In just one month, Petitioner Apple Inc. (“Petitioner”) has flooded the Board with *eleven* petitions challenging four related patents assigned to Universal Secure Registry LLC (“Patent Owner”). *See* IPR2018-00808, IPR2018-00809, IPR2018-00810, IPR2018-00811, IPR2018-00812, IPR2018-00813, CBM2018-00022, CBM2018-00023, CBM2018-00024, CBM2018-00025, CBM2018-00026. The present Petition (Paper 1, IPR2018-00809) is one of *three* petitions challenging claims 1, 2, 5-7, 9, 10 and 12 of U.S. Patent No. 9,530,137 (“the ’137 Petition”). *See also* IPR2018-00808, CBM2018-00022. Petitioner is unable to muster any anticipation ground against any claim of the ’137 patent. Instead, each of its petitions puts forth hindsight combinations that selectively cull components from prior art references in an attempt to fit the parameters of the patented invention. In the present case, the Petition attempts to combine “Jakobsson in view of Maritzen” to invalidate the independent claims—Claims 1 and 12—of the ’137 patent.

Like its other petitions attacking the ’137 patent, this Petition fails for several independent reasons. **First**, limitations 1[f], 1[h], and 12[f]¹ require a first device transmit “*the* one or more signals” to a second device for processing. The ’137 patent makes clear that three separate, and distinct, types of information must

¹ Patent Owner’s Preliminary Response adopts the limitation numbering format (e.g., “limitation 1[a]”) used by Petitioner in its Petition.

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