

PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

Petitioner,

v.

UNIVERSAL SECURE REGISTRY LLC,

Patent Owner

Case IPR2018-00812

U.S. Patent No. 8,856,539

PATENT OWNER'S SUR-REPLY

TABLE OF CONTENTS

	<u>Page</u>
PATENT OWNER’S LIST OF EXHIBITS	III
I. REBER AND FRANKLIN FAIL TO DISCLOSE ACCOUNT IDENTIFYING INFORMATION NOT PROVIDED TO A PROVIDER	1
A. Patent Owner Properly Applied Petitioner’s Construction	1
B. No Motivation to Combine Reber and Franklin	3
II. REBER AND FRANKLIN FAIL TO DISCLOSE “ACCESS RESTRICTIONS”	5
A. Intrinsic Evidence Supports Patent Owner’s Construction While Petitioner’s Effective Construction is Impermissibly Broad	5
B. Reber and Franklin Fail to Disclose “Access Restrictions”	10
C. Reber and Franklin Fail to Disclose Third Party Limitation	16
D. Reber and Franklin Fail to Disclose “Receive a Transaction Request...” Limitations of Claims 1 and 22	23
1. Intrinsic Evidence Supports Patent Owner’s Construction	23
2. Reber and Franklin Fail to Disclose “Receive a Transaction Request”	25
E. Reber and Franklin Fail to Disclose Claims 3 and 24.....	28
III. CONCLUSION.....	29

TABLE OF AUTHORITIES

	<u>Page</u>
Cases	
<i>Arendi S.A.R.L. v. Apple Inc.</i> , 832 F.3d 1355 (Fed. Cir. 2016)	12, 26
<i>Dayco Products, Inc. v. Total Containment, Inc.</i> , 258 F.3d 1317 (Fed. Cir. 2001)	8, 9
<i>DSS Technology Management, Inc. v. Apple, Inc.</i> , 885 F.3d 1367 (Fed. Cir. 2018)	12
<i>In re: Stepan Company</i> , 868 F.3d 1342 (Fed. Cir. 2017)	28
<i>Leggett & Platt, Inc. v. Hickory Springs Mfg. Co.</i> , 285 F.3d 1353 (Fed. Cir. 2002)	9
<i>Shire Development LLC v. Osmotica Kereskedelmi És Szolgáltató KFT</i> , No. 1:12-CV-00904-AT, 2013 WL 11740203 (N.D. Georgia Sept. 25, 2013).....	9
<i>Versa Corp. v. Ag-Bag Int’l Ltd.</i> , 392 F.3d 1325 (Fed. Cir. 2004)	8, 9
Statutory Authorities	
35 U.S.C. § 112	2, 7, 9
Rules and Regulations	
37 C.F.R. § 42.23(b)	17

PATENT OWNER'S LIST OF EXHIBITS

Ex. 2101	Declaration by Dr. Markus Jakobsson in Support of Patent Owner's Preliminary Response
Ex. 2102	Curriculum Vitae of Dr. Markus Jakobsson
Ex. 2103	Declaration ISO of Unopposed Motion for Admission Pro Hac Vice of Jordan B. Kaericher.
Ex. 2104	Declaration ISO of Unopposed Motion for Admission Pro Hac Vice of Harold A. Barza
Ex. 2105	U.S. Application No. 11/768,729
Ex. 2106	U.S. Application No. 09/710,703
Ex. 2107	Declaration by Dr. Markus Jakobsson in Support of Motion to Amend
Ex. 2108	Declaration of Dr. Markus Jakobsson in Support of Patent Owner's Response
Ex. 2109	Rough Deposition Transcript of Dr. Victor John Shoup
Ex. 2110	Disclaimer of Claims 5-8, 17-20, 26-30
Ex. 2111	Final Deposition Transcript of Dr. Victor John Shoup
Ex. 2112	U.S. District Court for Delaware Report and Recommendation.
Ex. 2113	Declaration by Dr. Markus Jakobsson in Support of Patent Owner's Reply to MTA Opposition

Petitioner’s Reply—which introduces new arguments in violation of the Board’s rules—fails to remedy several deficiencies in its Petition.

I. REBER AND FRANKLIN FAIL TO DISCLOSE ACCOUNT IDENTIFYING INFORMATION NOT PROVIDED TO A PROVIDER

A. Patent Owner Properly Applied Petitioner’s Construction

Petitioner contradicts itself when it argues that Patent Owner (PO) “Fails to Apply the Broadest Reasonable Interpretation of ‘Account Identifying Information.’” Reply at 2. It was Petitioner—not Patent Owner—who previously argued that “[u]nder the broadest reasonable construction standard, the term ‘account identifying information’ as used in the ’539 patent means ‘personal information about an entity such as name, address, or account number.’” Petition at 16; *see also id.* at 21, 37-38. In its Response (POR [Paper 25]), PO showed that, under Petitioner’s own proffered construction, both Reber and Franklin fail to disclose that account identifying information is not provided to a provider because these references each disclose name and/or address information to the provider. POR at 27-32. Thus, PO’s analysis simply applied Petitioner’s construction, and did not “improperly narrow the claims.” Reply at 2.

Backtracking on its own construction, Petitioner first contends that “claim 4 of the ’539 patent explicitly requires the secure registry to transmit address information to the provider,” and, consequently, “independent claim 1 must be

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