UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMERICAN MULTI-CINEMA, INC., ET AL.,
Petitioners

v.

FALL LINE PATENTS, LLC

Patent Owner

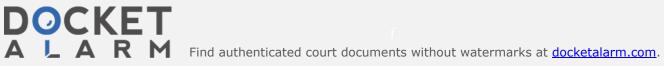
CASE IPR2019-00610 PATENT 9,454,748

PATENT OWNER'S SUR-REPLY TO PETITIONER'S
REPLY TO PATENT OWNER'S RESPONSE RE
INTER PARTES REVIEW OF U.S. PATENT NO. 9,454,748
CHALLENGING CLAIMS 1, 2, 5, 7, AND 19-22



TABLE OF CONTENTS

I.	Introduction1
II.	Petitioner Has Failed to Produce a Single Example of How a POSITA in
	2002 Might Have Used Java Micro Edition to Read a GPS in a Device
	Independent Manner1
III.	Petitioner Improperly Relies on Art That is Not Prior to the Earliest
	Claimed Priority Date of the Instant '748 Patent3
IV.	Petitioner Improperly Relies on the Document in EX 1020 to Establish a
	Chronology Without Providing Proper Authentication or Validation8
V.	Bandera Does Not Teach Java Running on a Handheld Computing
	Device That Can Read a GPS 10
VI.	There is No Showing That an Object-Oriented Language Produces
	Device Independent Executable Tokens 11
VII.	Claims 1 and 19-22 Are Not Obvious Over Barbosa (Ground 1) 13
VIII	. Claims 1 and 19-21 Are Not Obvious over Barbosa in View of Bandera
	(Ground 2)13



IX.	Barbosa in view of Falls Does not Render Claim 7 as Obvious (Ground
	3)13
	A. Barbosa at least does not teach "automatically transferring" (claim
	steps 7(b) and 7(e))
	B. Barbosa at least does not teach or render obvious "making available
	via the Internet" (claim 7(f))
X. C	Claims 1, 2, 5, and 19-22 Are Not Obvious Over Hancock (Ground 4) 18
XI.	Claims 1, 2, 5, and 19-22 Are Not Obvious Over Hancock in View of
	Bandera (Ground 5)
XII.	Hancock in view of Falls Does not Render Claim 7 as Obvious (Ground
	6)20
	A. Hancock at least does not teach "automatically transferring" (claim
	steps 7(b))20
	B. Hancock at least does not teach "making available on the Internet"
	(claim step 7(f))
	(



TABLE OF AUTHORITIES

Cases	age
Hilgraeve, Inc. v. Symantec Corp., 271 F. Supp. 2d 964, 974–75	
(E.D. Mich. 2003)	8
Statutes	
35 USC §311(b)	3
Rules	
37 C.F.R. § 42.62(b)	8
Federal Rules of Evidence 901	9



PATENT OWNER'S EXHIBIT LIST

February 25, 2020

EX 2001	The Java TM Programming Language, Third Edition, Kan Arnold, James, Gosling, and David Holmes, Addison Wesley, © 2000, 4 th Printing October 2001.
EX 2002	Programming Wireless Devices with the Java TM 2 Platform, Micro Edition, Roer Riggs, Antero Taivalsaari, and Mark VandenBrink, Addison Wesley, © 2001
EX 2003	Defendants' Motion to Stay Litigation Pending Inter Partes Review of the Patent-In-Suit, <i>Fall Line Patents, LLC v. Zoe's Kitchen, Inc. and Zoe's Kitchen USA, LLC</i> , U.S.D.C., ED TX, Tyler Div., Case No. 6:18-CV-407-RWS
EX 2004	Defendants' Reply In Support of Their Motion to Stay Litigation Pending Inter Partes Review of the Patent-in-Suit, Fall Line Patents, LLC v. Zoe's Kitchen, Inc. and Zoe's Kitchen USA, LLC, U.S.D.C., ED TX, Tyler Div., Case No. 6:18-CV-407-RWS
EX 2005	Declaration of Dr. Samuel H. Russ under 37 C.F.R. §1.68 in Opposition to Decision Granting <i>Inter Partes</i> Review of U.S. Patent No. 9,454,748 (Claims 1,2,5,7, and 19-22)



DOCKET

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.

