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

STARBUCKS CORPORATION ET AL.

Petitioners

v.

FALL LINE PATENTS, LLC

Patent Owner

CASE IPR2019-00610

PATENT 9,454,748

**PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 9,454,748
CHALLENGING CLAIMS 1, 2, 5, 7, AND 19-22**

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EX 2002	<i>Programming Wireless Devices with the Java™ 2 Platform, Micro Edition</i> , 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, <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

**PATENT OWNER’S PRELIMINARY RESPONSE TO PETITION FOR
INTER PARTES REVIEW OF U.S. PATENT NO. 9,454,748
CHALLENGING CLAIMS 1-22**

I. Introduction

Fall Line Patents, LLC (hereinafter “Patentee”), the owner of the entire interest in U.S. Patent No. 9,454,748 (hereinafter the “748 Patent”) hereby tenders its Preliminary Response to Petition for *Inter Partes* Review (“IPR”) of the ‘748 Patent (hereinafter the “Petition”). The above-mentioned Petition, which is now assigned Case IPR2019-00610, was filed by Starbucks Corporation et al. (hereinafter “Petitioners”) and mailed on or about January 22, 2019. As explained in detail below, there is no reasonable likelihood that Petitioners would prevail in establishing anticipation or obviousness of any of the challenged claims during this *inter partes* review.

II. Background of the Case

Litigation Involving the Subject Patent

The ‘748 patent is presently the subject of patent infringement lawsuits filed in the Eastern District of Texas against the following entities:

Case Caption	
Fall Line Patents, LLC v. Zoe’s Kitchen, Inc. et al	6:18-cv-00407
Fall Line Patents, LLC v. AMC Ent. Holdings, Inc. et al	6:18-cv-00408
Fall Line Patents, LLC v. Boston Market Corp.	6:18-cv-00409

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