

CASE IPR2019-01279
Patent No. 8,510,407

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO HOLDING COMPANY, INC.,
LENOVO (UNITED STATES) INC., and
MOTOROLA MOBILITY LLC,
Petitioners,

v.

DODOTS LICENSING SOLUTIONS LLC,
Patent Owner.

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PATENT OWNER DODOTS LICENSING SOLUTIONS, LLC'S

PATENT OWNER RESPONSE

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EXHIBIT LIST

Exhibit No.	Description
2003	Declaration of Rakesh Ramde
2004	Declaration of Dr. Earl Sacerdoti
2005	Curriculum Vitae of Dr. Earl Sacerdoti

I. Introduction

Petitioners' arguments fail for many reasons, but the simplest one is that all the claims require what the patent refers to as a "networked information monitor template" (i.e., "NIM template"), which the patent distinguishes from an executable program. As explained in detail below and the accompanying declaration of computer science expert Dr. Earl Sacerdoti, NIM templates are data structures, they are not executable programs. By contrast, the references relied upon by the Petitioners for this limitation all involve downloading executable programs, and are precisely what was distinguished by the inventors.

Petitioners' arguments also fail for another simple reason: all the claims require what the patent refers to as a "networked information monitor" (i.e., "NIM"). The patent defines the NIM as a type of frame through which content is presented to the user. Given that this frame is used to present content to a user, it is something that exists on the user's client computing device. Moreover, the patent makes clear that the frame is instantiated on the user's client computing device in a specific way; namely, by utilizing the definitional information contained in the data structure that is the NIM template. In the patented invention, the NIM template, not the NIM, is downloaded to the user's client computing device. To try to map the prior art to the NIM limitation, Petitioners point to an executable program downloaded from the server, but the NIM is not an executable program (it's a frame). In addition, the patent explains that the NIM

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