

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of: John A. Kembel, et al.
U.S. Patent No.: 8,510,407
Issue Date: August 13, 2013
Appl. Serial No.: 11/932,553
Filing Date: October 31, 2007
Title: DISPLAYING TIME-VARYING INTERNET BASED
DATA USING APPLICATION MEDIA PACKAGES
Case No.: IPR2019-_____

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**PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT
NO. 8,510,407 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42**

TABLE OF CONTENTS

I.	REQUIREMENTS FOR IPR	1
A.	Standing.....	1
B.	Challenges	1
II.	SUMMARY OF THE '407 PATENT	2
A.	Brief Description	2
B.	Prosecution History	3
C.	Claim Construction.....	4
D.	Level of Ordinary Skill	8
III.	OVERVIEW OF THE PRIOR ART	8
A.	USPN 5,919,247 to <i>Hoff</i>	8
B.	<i>Berg</i>	9
C.	USPN 6,401,134 to <i>Razavi</i>	10
D.	USPN 5,999,941 to <i>Anderson</i>	12
E.	USPN 5,983,227 to <i>Nazem</i>	13
F.	US Pub. No. 2002/0023110 to <i>Fortin</i>	13
IV.	THE CHALLENGED CLAIMS	13
V.	SUMMARY OF UNPATENTABILITY GROUNDS.....	18
VI.	THE CHALLENGED CLAIMS ARE UNPATENTABLE.....	20
A.	[GROUND 1] – Claims 1, 9-13, and 21-24 are rendered obvious by <i>Hoff</i> , in view of <i>Berg</i> and <i>Nazem</i> or Applicant Admitted Prior Art (“APA”)	20
B.	[GROUND 2] – Claims 8 and 20 are rendered obvious by <i>Hoff</i> in view of <i>Berg</i> , <i>Nazem</i> or APA in the '407 Patent, and <i>Fortin</i>	37
C.	[GROUND 3] – Claims 1, 9-13, 21-24 are rendered obvious by <i>Razavi</i> in view of <i>Anderson</i>	41
D.	[GROUND 4] – Claims 8 and 20 are rendered obvious by <i>Razavi</i> in view of <i>Anderson</i> and <i>Fortin</i>	64
VII.	PAYMENT OF FEES – 37 c.f.r. § 42.103.....	67
VIII.	CONCLUSION.....	67

IX. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1).....67

- A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)67
- B. Related Matters Under 37 C.F.R. § 42.8(b)(2)67
- C. Lead and Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)68
- D. Service Information Under 37 C.F.R. § 42.8(b)(4).....68

EXHIBITS

Exhibit No.	Exhibit
EX1001	U.S. Patent No. 8,510,407 to Kembel, et al. (the “407 Patent”)
EX1002	Prosecution History of U.S. Patent No. 8,510,407
EX1003	Declaration of Vijay Madiseti
EX1004	U.S. Patent No. 5,919,247 to Hoff, et al. (“Hoff”)
EX1005	Declaration of Cliff Berg
EX1006	U.S. Patent No. 6,401,134 to Razavi, et al. (“Razavi”)
EX1007	U.S. Patent No. 5,983,227 to Nazem, et al. (“Nazem”)
EX1008	U.S. Patent Pub. No. 2002/0023110 to Fortin, et al. (“Fortin”)
EX1009	Cliff Berg, <i>How Do I Create a Signed Castanet Channel</i> , DR. DOBB’S JOURNAL, January 1, 1998, http://www.drdoobs.com/jvm/how-do-i-create-a-signed-castanet-channe/184410474 (“Berg”)
EX1010	Curriculum Vitae of Vijay Madiseti
EX1011	Prosecution History of U.S. Application No. 09/558,925.
EX1012	U.S. Patent No. 5,999,941 to Anderson (“Anderson”)
EX1013	U.S. Patent No. 8,020,083 to Kembel, et al. (“083 Patent”)

Pursuant to 35 U.S.C. § 311 and 37 C.F.R. § 42.100, Lenovo Holding Company, Inc., Lenovo (United States) Inc. and Motorola Mobility LLC (“Lenovo”) petition for *inter partes* review (“IPR”) of Claims 1, 8-13, and 20-24 (the “Challenged Claims”) of U.S. Patent No. 8,510,407 (“’407 Patent”), owned by DoDots Licensing Solutions LLC (“PO”).

I. REQUIREMENTS FOR IPR

A. Standing

Lenovo hereby certifies that the ’407 Patent is available for IPR and that Lenovo is not barred or estopped from requesting IPR of the Challenged Claims.

B. Challenges

This IPR presents the following grounds:

Ground	Claims	Basis for Rejection
1	Claims 1, 9-13, and 21-24	103: <i>Hoff, Berg & Nazem or Admitted Prior Art</i>
2	Claims 8 and 20	103: <i>Hoff, Berg, Nazem or Admitted Prior Art, & Fortin</i>
3	Claims 1, 9-13, and 21-24	103: <i>Razavi & Anderson</i>
4	Claims 8 and 20	103: <i>Razavi, Anderson & Fortin</i>

While *Hoff*, *Razavi*, and *Nazem* appear on the face of the ’407 Patent, they were not substantively applied or discussed during prosecution. *Berg*, *Anderson*, and *Fortin* were not cited during prosecution.

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