

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BLOOMREACH, INC.
Petitioner,

v.

GUADA TECHNOLOGIES LLC
Patent Owner.

Case No. IPR2019-01304

Patent No. 7,231,379

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,231,379**

Table of Contents

I.	INTRODUCTION	1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)	2
	A. Real Party-In-Interest	2
	B. Related Matters.....	2
	C. Lead and Back-Up Counsel.....	3
III.	SUMMARY OF THE '379 PATENT	4
	A. Description of the alleged invention of the '379 Patent.....	4
	B. Summary of the prosecution history of the '379 Patent.....	7
IV.	REQUIREMENTS FOR <i>INTER PARTES</i> REVIEW UNDER 37 C.F.R. § 42.104.....	8
	A. Grounds for standing under 37 C.F.R. § 42.104(a).....	8
	B. Identification of challenge under 37 C.F.R. § 42.104(b) and relief requested	9
	C. Level of skill of a person having ordinary skill in the art	10
	D. Claim construction under 37 C.F.R. § 42.104(b)(3)	10
	1. “node”	11
	2. “vertex”	11
	3. “keyword”	13
	4. “jumping”.....	14
	5. “verbal description”	15
V.	THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS OF THE '379 PATENT ARE UNPATENTABLE.....	16
	A. Ground 1: <i>Wesemann</i> renders claims 1, 2, and 7 obvious	16
	1. Claim 1	17
	2. Claim 2	30
	3. Claim 7	33
	B. Ground 2: <i>Wesemann</i> in view of <i>Rajaraman</i> renders Claims 3-6 obvious	40

1. Claims 3-4	43
2. Claims 5-6	48
C. Ground 3: <i>Fratkina</i> renders claims 1, 2, and 7 obvious.....	54
1. Claim 1	56
2. Claim 2	64
3. Claim 7	65
D. Ground 4: <i>Fratkina</i> in view of <i>Rajaraman</i> renders Claims 3-6 obvious	70
VI. CONCLUSION	72
CERTIFICATION OF WORD COUNT	73
CERTIFICATE OF SERVICE	74

EXHIBIT LIST

<u>Exhibit</u>	<u>Description</u>
Ex. 1001	U.S. Patent 7,231,379 to Parikh <i>et al.</i> ('379 Patent)
Ex. 1002	File History of U.S. Patent 7,231,379 to Parikh <i>et al.</i> ('379 Patent File History)
Ex. 1003	Guada's Combined Opposition to Defendants' Motion to Dismiss
Ex. 1004	U.S. Pat. No. 6,731,724 to Wesemann <i>et al.</i> ("Wesemann")
Ex. 1005	U.S. Pat. No. 6,366,910 to Rajaraman <i>et al.</i> ("Rajaraman")
Ex. 1006	U.S. Pat. No. 7,539,656 to Fratkina <i>et al.</i> ("Fratkina")
Ex. 1007	Declaration of Dr. Padhraic Smyth
Ex. 1008	RESERVED
Ex. 1009	Dr. Padraic Smyth Curriculum Vitae
Ex. 1010	Hopcroft, John E., and Jeffrey D. Ullman. <i>Data Structures and Algorithms</i> . Boston, MA, USA, Addison-Wesley, pp. 75-106, 155-197, 306-346, 1983
Ex. 1011	Donald, B. Crouch, Carolyn J. Crouch, and Glenn Andreas, <i>The use of cluster hierarchies in hypertext information retrieval</i> , Hypertext '89 Proceedings, ACM Press, pp. 225-237, 1989
Ex. 1012	Yvan Leclerc, Steven W. Zucker, Denis Leclerc, McGill University, <i>A browsing approach to documentation</i> , IEEE Computer, IEEE Press, pp 46-49, 1982
Ex. 1013	Ricky E. Savage, James K. Habinek, Thomas W. Barnhart, <i>The design, simulation, and evaluation of a menu driven user interface</i> , Proceedings of the 1982 Conference on Human Factors in Computing Systems, ACM Press, pp 36-40, 1982
Ex. 1014	Ricardo Baeza-Yates, Berthier Ribiero-Neto, <i>Modern Information Retrieval</i> , pp. 24-40, ACM Press, 1999
Ex. 1015	Daniel Cunliffe, Carl Taylor, and Douglas Tudhope, <i>Query-based navigation in semantically indexed hypermedia</i> , Proceedings of the Eighth ACM Conference on Hypertext, pp. 87-95, ACM Press, 1997
Ex. 1016	Hornstein, <i>Telephone Voice Interfaces on the Cheap</i> at § 2.3, Proceedings of the UBLAB '94 Conference, 1994
Ex. 1017	De Bra, Paul, <i>et al.</i> , <i>Information Retrieval in Distributed Hypertexts</i> , in RIAO, pp. 481-493, 1995

Ex. 1018	U.S. Pat. No. 6,198,939 to Holstrom
Ex. 1019	Karen Sparck Jones, A look back and a look forward, Proceedings of the 11th ACM SIGIR International Conference on Research and Development in Information Retrieval, pp. 13-29, ACM Press, 1988
Ex. 1020	Gerard Salton, Anita Wong, and Chung-Shu Yang, <i>A vector space model for automatic indexing</i> , Communications of the ACM, 18(11): 613-620, 1975
Ex. 1021	Jinxi Xu, W. Bruce Croft, <i>Query expansion using local and global document analysis</i> , Proceedings of the 19th ACM SIGIR International Conference on Research and Development in Information Retrieval, pp. 4-11, ACM, 1996
Ex. 1022	Carolyn J. Crouch, <i>A cluster-based approach to thesaurus construction</i> , Proceedings of the 11th ACM SIGIR International Conference on Research and Development in Information Retrieval pp. 309-320. ACM, 1988
Ex. 1023	Hinrich Schütze and Jan O. Pedersen, <i>A cooccurrence-based thesaurus and two applications to information retrieval</i> , 1 Intelligent Multimedia Information Retrieval Systems and Management, pp. 266-274, 1994
Ex. 1024	Güntzer et al., <i>Automatic Thesaurus Construction by Machine Learning from Retrieval Sessions</i> , 25 Information Processing & Management No. 3 pp. 265-273, 1998
Ex. 1025	Mostafa et al., <i>A Multilevel Approach to Intelligent Information Filtering: Model, System, and Evaluation</i> , 15 ACM Transactions on Information Systems No. 4, pp. 368-399, 1997
Ex. 1026	U.S. Patent No. 6,006,225 to Bowman <i>et al.</i>

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.