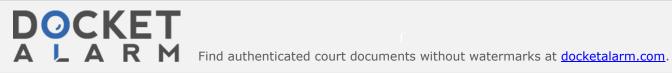
UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
SLING TV L.L.C.
Petitioner
V.
UNILOC 2017 LLC
Patent Owner
IPR2019-01367
PATENT 8,407,609

PATENT OWNER PRELIMINARY RESPONSE TO PETITION PURSUANT TO 37 C.F.R. §42.107(a)



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1.	The Petition does not show that McTernan teaches "wherein each provided webpage causes corresponding digital media presentation data to be streamed from a second computer system distinct from the first computer system directly to the user's computer independent of the first computer system" under Petitioner's interpretation of claim 1
2.	The Petition does not provide sufficient reason to combine teachings from McTernan and Robinson to result in a system "wherein each stored data is together indicative of a cumulative time the corresponding web page was displayed by the user's computer," under Petitioner's interpretation



D.

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I. INTRODUCTION

Uniloc 2017 LLC ("Uniloc" or "Patent Owner") submits this Preliminary Response to Petition IPR2019-01367 for *Inter Partes* Review ("Pet." or "Petition") of United States Patent No. 8,407,609 ("the '609 patent" or "EX1001") filed by Sling TV L.L.C. ("Petitioner"). The instant Petition is defective for at least the reasons set forth herein.

II. THE '609 PATENT

The '609 patent is titled "System and method for providing and tracking the provision of audio and visual presentations via a computer network." The '609 patent issued March 26, 2013, from U.S. Patent Application No. 12/545,131 filed August 21, 2009, claiming priority to provisional application No. 61/090,672, filed on August 21, 2008.

Claim 1 recites:

1. A method for tracking digital media presentations delivered from a first computer system to a user's computer via a network comprising:

providing a corresponding web page to the user's computer for each digital media presentation to be delivered using the first computer system;

providing identifier data to the user's computer using the first computer system;

providing an applet to the user's computer for each digital media



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