

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

World Programming Limited

Petitioners

v.

SAS Institute Inc.

Patent Owner

---

Case No. Unassigned  
Patent 7,170,519

---

**PETITION FOR INTER PARTES REVIEW  
OF U.S. PATENT NO. 7,170,519**

**TABLE OF CONTENTS**

I. INTRODUCTION .....1

    A. Summary of Unpatentability Grounds .....1

II. MANDATORY NOTICES, STANDING, AND FEES.....1

    A. Mandatory Notices .....1

    B. Certification of Grounds for Standing.....2

    C. Fees.....2

III. OVERVIEW OF THE '519 PATENT .....2

    A. Subject Matter of the '519 Patent.....2

    B. The Priority Date of the Challenged Claims .....5

IV. SUMMARY OF PRIOR ART.....5

    A. U.S. Patent No. 6,920,608: Chart View for Reusable Data Markup Language (“Davis”).....6

    B. XML Bible by Elliotte Rusty Harold (“Harold”).....7

V. Claim Construction.....9

    A. Means-Plus-Function Terms .....9

        1. “data source generating means” .....10

        2. “graph generator module” .....12

    B. Level of Ordinary Skill in the Art .....15

VI. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE .....15

    A. Ground 1: Claims 1-4, 14-18, 21, 27, 29-30, 34-36, 39, 42-46, 47, 49, 51-53, and 56 are obvious over Davis and Harold in view of the Knowledge of One of Ordinary Skill in the Art.....15

Petition for *IPR* of U.S. Patent 7,170,519

1.	A POSA would have been motivated to combine Davis with Harold .....	15
2.	Claim 1 .....	17
3.	Claims 2 and 3.....	34
4.	Claim 4.....	36
5.	Claim 14.....	39
6.	Claim 15.....	40
7.	Claim 16.....	44
8.	Claim 17.....	45
9.	Claim 18.....	47
10.	Claim 21 .....	49
11.	Claim 27.....	50
12.	Claim 29.....	53
13.	Claim 30.....	55
14.	Claim 34.....	56
15.	Claims 35-36, 42-46, and 49.....	63
16.	Claim 39.....	65
17.	Claim 47.....	66
18.	Claim 51 .....	66
19.	Claims 52 and 53.....	69
20.	Claim 56.....	72
	VII. CONCLUSION.....	72

Petition for *IPR* of U.S. Patent 7,170,519

**LIST OF EXHIBITS**

1001	U.S. Patent No. 7,170,519 to Patel (“the ’519 Patent”)
1002	CV of Dr. Stephen Gray
1003	Expert Declaration of Dr. Stephen Gray
1004	File History of U.S. Patent No. 7,170,519 to Patel
1005	U.S Patent No. 6,920,608 to Davis (“Davis”)
1006	<i>XML Bible</i> by Elliotte Rusty Harold (“Harold”)
1007	Reserved
1008	Reserved
1009	Reserved
1010	Expert Declaration of Sylvia Hall-Ellis
1011	SAS Institute Inc’s Preliminary Claim Constructions and Extrinsic Evidence Pursuant to P.R. 4-2

## I. INTRODUCTION

Petitioners request *inter partes* review of Claims 1-4, 14-18, 21, 27, 29-30, 34-36, 39, 42-46, 47, 49, 51-53, and 56 of U.S. Patent No. 7,170,519 (“the ’519 Patent”).

Petitioners assert that there is a reasonable likelihood that the challenged claims are unpatentable and request review of, and cancellation of, the challenged claims under 35 U.S.C. § 103.

### A. Summary of Unpatentability Grounds

Ground	Summary
1	Claims 1-4, 14-18, 21, 27, 29-30, 34-36, 39, 42-46, 47, 49, 51-53, and 56 are obvious in view of Davis and Harold

## II. MANDATORY NOTICES, STANDING, AND FEES

### A. Mandatory Notices

Real Party in Interest: The real parties-in-interest are Petitioner World Programming Limited, Yum! Brands, Inc., Pizza Hut, Inc., Pizza Hut, LLC, and Angoss Software Corporation.

Related Matters: The ’519 Patent is subject to a pending lawsuit entitled SAS Institute Inc., v. World Programming Limited, et. al., Case No. 2-18-cv-00295 (E.D. Tex.) (the “Litigation”) in which Petitioner World Programming Limited is a defendant. In addition, on the same day this Petition was filed, Petitioner concurrently filed one other Petition relating to the ’519 Patent.

# 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.