

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 7,447,686

**PETITION FOR INTER PARTES REVIEW
OF U.S. PATENT NO. 7,447,686**

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Petition for *IPR* of U.S. Patent 7,447,686

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LIST OF EXHIBITS

1001	U.S. Patent No. 7,447,686
1002	CV of Dr. David Maier
1003	Expert Declaration of Dr. David Maier
1004	File History of the '686 Patent
1005	<i>IEEE 100: The Authoritative Dictionary of IEEE Standards Terms</i> , (7 th ed. 2000) (“IEEE Dictionary”)
1006	<i>InterViso: Dealing with the Complexity of Federated Database Access</i> , by Marjorie Templeton et al., VLDB Journal, Vol. 4, Issue 2 (April 1995) (“InterViso”)
1007	<i>SQL in a Nutshell: A Desktop Quick Reference</i> , by Kevin Kline & Daniel T. Kline (1 st ed. 2001) (“Nutshell”)
1008	<i>Informix Guide to SQL: Tutorial</i> , by Informix Press (2 nd ed. 2000) (“Tutorial”)
1009	<i>Transact-SQL Programming</i> , by Kevin Kline et al. (1 st ed. 1999) (“Transact”)
1010	<i>SQL: The Complete Reference</i> , by James R. Groff & Paul N. Weinberg (1 st ed. 1999) (“Groff”)
1011	<i>The C Programming Language</i> , by Brian Kernighan & Dennis Ritchie (2 nd ed. 1988) (“Ritchie”)
1012	Expert Declaration of Dr. Sylvia Hall-Ellis
1013	<i>SunWorld Online - New Products</i> , advertisement for InterViso 3.0 (December 1995)
1014	<i>Implementation of a Database Factory</i> , by Asokan R. Selvaraj & Debasish Ghosh, ACM SIGPLAN Language Tips, Vol. 32, Issue 6 (June 1997) (“Selvaraj”)

I. INTRODUCTION

Petitioners request *inter partes* review of claims 1-12 and 46-48 of U.S. Patent No. 7,447,686 (“the ’686 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 1-12 and 46-48 are obvious in view of InterViso, Selvaraj, and the knowledge of a POSITA.

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 ’686 Patent is subject to a pending lawsuit entitled SAS Institute Inc. v. World Programming Limited et al., Case No. 2:18-cv-00295-JRG (E.D. Tex.) (the “Litigation”) in which Petitioner is the defendant. In addition, on the same day this Petition was filed, Petitioner concurrently filed one other Petition relating to the ’686 Patent.

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