

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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World Programming Limited

Petitioners

v.

SAS Institute, Inc.

Patent Owner

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Case No. Unassigned  
Patent 7,447,686

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

**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 '686 PATENT .....2

    A. Subject Matter of the '686 Patent.....2

    B. The Priority Date of the Challenged Claims .....6

IV. SUMMARY OF PRIOR ART.....6

    A. Background .....6

    B. InterViso: Dealing with the Complexity of Federated Database Access by Marjorie Templeton et al. (“InterViso”).....9

    C. Implementation of a Database Factory by Asokan R. Selvaraj et al. (“Selvaraj”).....12

V. CLAIM CONSTRUCTION .....20

    A. Level of Ordinary Skill in the Art.....21

VI. THERE IS A REASONABLE LIKELIHOOD THAT THE CHALLENGED CLAIMS ARE UNPATENTABLE .....21

    A. Ground 1: Claims 13-40, 43-45, and 50 are Obvious in Light of InterViso as modified by Selvaraj and in View of the Knowledge of a POSITA Under 35 U.S.C. § 103 .....21

        1. Motivation to Modify InterViso with Selvaraj .....21

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

2.	Claim 1 .....	25
3.	Claims 13-15 and 25-26.....	51
4.	Claim 16-18.....	54
5.	Claim 19.....	55
6.	Claims 20-24 and 29 .....	57
7.	Claims 27-28 .....	60
8.	Claims 30-32 .....	61
9.	Claim 33 .....	62
10.	Claims 34 and 35.....	62
11.	Claims 36, 38-39 .....	64
12.	Claims 37, 40 .....	65
13.	Claim 43.....	67
14.	Claims 44-45 .....	67
15.	Claim 50 .....	70
VII.	CONCLUSION.....	70

**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 <sup>th</sup> 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 <sup>st</sup> ed. 2001) (“Nutshell”)
1008	<i>Informix Guide to SQL: Tutorial</i> , by Informix Press (2 <sup>nd</sup> ed. 2000) (“Tutorial”)
1009	<i>Transact-SQL Programming</i> , by Kevin Kline et al. (1 <sup>st</sup> ed. 1999) (“Transact”)
1010	<i>SQL: The Complete Reference</i> , by James R. Groff & Paul N. Weinberg (1 <sup>st</sup> ed. 1999) (“Groff”)
1011	<i>The C Programming Language</i> , by Brian Kernighan & Dennis Ritchie (2 <sup>nd</sup> 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 13-40, 43-45, and 50 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 13-40, 43-45, and 50 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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