#### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

\_\_\_\_\_

BEFORE THE PATENT TRIAL AND APPEAL BOARD

\_\_\_\_\_

JUNIPER NETWORKS, INC. & PALO ALTO NETWORKS, INC.

Petitioners,

v.

PACKET INTELLIGENCE LLC,

Patent Owner.

\_\_\_\_\_

Case IPR2020-00337

U.S. Patent No. 6,771,646

\_\_\_\_\_

PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 6,771,646



### TABLE OF CONTENTS

I.	MANDATORY NOTICES UNDER 37 C.F.R. §42.8(a)(1)1			
	A.	Section 42.8(b)(1): Real Party-In-Interest		
	B.	Section 42.8(b)(2): Related Matters	1	
	C.	Sections 42.8(b)(3) and (4): Lead and Back-Up Counsel and Service Information	3	
II.	PAYMENT OF FEES		4	
III.	GRO	UNDS FOR STANDING UNDER §42.104(a)4		
IV.	SEC	TIONS 325(d) AND 314(a) FACTORS FAVOR PETITIONERS		
V.	THE	E PURPORTED INVENTION5		
VI.	IDENTIFICATION OF CHALLENGE UNDER §42.104(b)			
	A.	Claims and Statutory Grounds	7	
	B.	Level of Skill in the Art and Claim Construction	7	
		1. "Conversational Flow"	8	
		2. "The Flow"/"New Flow"/"Existing Flow"	12	
		3. "Flow-Entry Database" Terms	14	
		4. All Remaining Claim Terms	16	
VII.	THE	CHALLENGED CLAIMS ARE UNPATENTABLE	17	
	A. Ground 1: Riddle in View of Ferdinand and Wakeman Renders Obvious Claims 1-3, 7, 16, and 18			
		1. Riddle Overview	17	
		2. Ferdinand Overview	22	



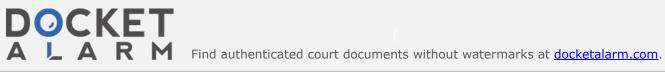
	3.	Reasons to Modify Riddle in View of Ferdinand	25
	4.	Wakeman Overview	27
	5.	Reasons to Modify the Combination of Riddle and Ferdinand Further in View of Wakeman	29
	6.	Riddle in View of Ferdinand and Wakeman Renders Obvious Claims 1 and 7.	30
	7.	Riddle in View of Ferdinand and Wakeman Renders Obvious Claims 2 and 3.	72
	8.	Riddle in View of Ferdinand and Wakeman Renders Obvious Claim 16.	76
	9.	Riddle in View of Ferdinand and Wakeman Renders Obvious Claim 18.	79
B.		nd 2: Riddle in View of Ferdinand and Wakeman and ter in View of Yu Render Obvious Claims 1-3, 7, 16, and 18.	80
	1.	Yu Overview	81
	2.	Riddle in View of Ferdinand and Wakeman and Further in View of Yu Teaches "Conversational Flows" and the Claimed State Operations.	83
	3.	Reasons to Modify the Combination of Riddle, Ferdinand, and Wakeman Further in View of Yu	84
C.	Furth	nd 3: Riddle in View of Ferdinand and Wakeman and ter in View of RFC1945 Render Obvious Claims 1-3, 7, 16, 8.	87
	1.	RFC1945 Overview	87
	2.	Riddle in View of Ferdinand and Wakeman and Further in View of RFC1945 Teaches "Conversational Flows."	89
	3.	Reasons Modify the Combination of Riddle, Ferdinand, and Wakeman and in Further View of RFC1945	93



VIII.	SECONDARY CONSIDERATIONS	95
IX	CONCLUSION	95



Exhibit	Description	
1001	U.S. Patent No. 6,651,099 ("the '099 Patent")	
1002	U.S. Patent No. 6,665,725 ("the '725 Patent")	
1003	U.S. Patent No. 6,771,646 ("the '646 Patent")	
1004	U.S. Patent No. 6,839,751 ("the '751 Patent")	
1005	U.S. Patent No. 6,954,789 ("the '789 Patent")	
1006	Declaration of Dr. Jon B. Weissman	
1007	Curriculum vitae of Dr. Weissman	
1008	U.S. Patent No. 6,412,000 ("Riddle")	
1009	PCT Publication WO 92/19054 ("Ferdinand")	
1010	RFC 1945 - Hypertext Transfer Protocol HTTP/1.0 ("RFC1945")	
1011	U.S. Patent No. 6,625,150 ("Yu")	
1012	Provisional Patent Application No. 60/112,859 ("the '859 Provisional")	
1013	PCT Publication WO 97/23076 ("Baker")	
1014	U.S. Patent No. 5,740,175 ("Wakeman")	
1015	U.S. Patent No. 5,805,808 ("Hasani")	
1016	Provisional Patent Application No. 60/141,903 ("the '903 Provisional")	
1017	File History for U.S. Patent No. 6,651,099	
1018	File History for U.S. Patent No. 6,665,725	
1019	File History for U.S. Patent No. 6,771,646	
1020	File History for U.S. Patent No. 6,771,646 – February 10, 2004, Response to Office Action	
1021	File History for U.S. Patent No. 6,839,751	
	•	
1022	File History for U.S. Patent No. 6,954,789	



# DOCKET A L A R M

# 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.

