

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

Petitioner,

v.

PACKET INTELLIGENCE LLC

Patent Owner.

Case IPR2020-00337

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

PETITIONER'S PRELIMINARY REPLY TO PATENT OWNER'S PRELIMINARY RESPONSE ADDRESSING THE ISSUE OF DISCRETIONARY DENIAL UNDER § 314(a)

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UPDATED LIST OF EXHIBITS

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

Exhibit	Description
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
1023	Certified Translation of German Federal Patent Court Nos. 2Ni 26/16 (EP) and 2(Ni 46/16) (July 12, 2018)
1024	Provisional Patent Application No. 60/066,864 (“the ’864 Provisional”)
1025	Redline showing a comparison of Riddle to Provisional Patent Application No. 60/066,864
1026	Claim Chart comparing claims 1, 8, and 11 of Riddle to the specification of Provisional Patent Application No. 60/066,864
1027	U.S. Patent Application 08/977,642 (“Packer Application”)
1028	U.S. Patent Application 09/198,051 (“the ’051 Application”)
1029	U.S. Patent No. 5,802,106
1030	U.S. Patent No. 6,038,216
1031	U.S. Patent No. 6,046,980 (“Packer”)
1032	<i>PointCast Inc. is Testing a New Screen-Saver Product</i> , The Wall Street Journal (April 15, 1996)
1033	Gillin, Paul. <i>Editorial</i> , Computer World (May 13, 1996)
1034	Sneider, Daniel. <i>Redefining News in the Era of Internet By Blending Print and Television, Silicon Valley Start-up Shakes up Traditional View of News</i> , The Christian Science Monitor (June 26, 1996)
1035	PointCast Inc. 1998 SEC Filings
1036	U.S. Patent No. 6,807,558
1037	RFC 765 – File Transfer Protocol (“RFC765”)

Exhibit	Description
1038	RFC 791 – Internet Protocol (“RFC791”)
1039	RFC 793 – Transmission Control Protocol (“RFC793”)
1040	RFC 1543 – Instructions to RFC Authors (“RFC1543”)
1041	RFC 2026 – The Internet Standards Process – Revision 3 (“RFC2026”)
1042	RFC 2616 – Hypertext Transfer Protocol – HTTP/1.1 (“RFC2616”)
1043	International Standard ISO/IEC 7498 – Information Processing Systems – Open Systems Interconnection – Basic Reference Model – Part 4: Management Framework (Nov. 15, 1989)
1044	Internet Archive Affidavit for RFC1945
1045	Internet Archive Affidavit for RFC 1889 – RTP: A Transport Protocol for Real-Time Applications (“RFC1889”)
1046	Internet Archive Affidavit for RFC 2326 – Real Time Streaming Protocol (RTSP) (“RFC2326”)
1047	Chart comparing Yu to Provisional Patent Application No. 60/112,859
1048	Claim Chart comparing Yu’s claim 1 to the Provisional Patent Application No. 60/112,859
1049	<i>Sandvine Corp. v. Packet Intelligence, LLC</i> , No. IPR2017-00769, Paper No. 10 (Opposition to Request for Rehearing) (September 15, 2017)
1050	<i>Sandvine Corp. v. Packet Intelligence, LLC</i> , No. IPR2017-00450, Paper No. 6 (Preliminary Response) (April 28, 2017)
1051	<i>Sandvine Corp. v. Packet Intelligence, LLC</i> , No. IPR2017-00451, Paper No. 6 (Preliminary Response) (April 28, 2017)
1052	<i>Sandvine Corp. v. Packet Intelligence, LLC</i> , No. IPR2017-00629, Paper No. 6 (Preliminary Response) (April 28, 2017)

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