

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioner,

v.

UNILOC 2017 LLC,

Patent Owner.

Case No. IPR2020-00755
U.S. Patent No. 6,366,908
Filing Date: December 30, 1999
Issue Date: April 2, 2002

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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I. INTRODUCTION

Abandoning the construction it advanced in litigation for the term “keyfact,” Uniloc’s Patent Owner Response (POR) introduces a new construction. POR 9. Uniloc now seeks to narrowly define “keyfact” as “a factual extraction of a sentence which expresses semantic relation between words in the sentence in the form of [object, property].” POR 9. This new construction contradicts the intrinsic evidence. Regardless, this new construction does not impact the outcome of this proceeding.

If the Board rejects Uniloc’s new construction, Uniloc does not dispute that *Braden-Harder*’s extracted logical form triples are facts contained in sentences, meet the keyfact limitation, and provide a concept-based retrieval system. Pet. 34; Jansen Decl., ¶176 (“Ex. 1003”). Alternatively, even if the Board adopts Uniloc’s new construction, as Google and its expert, Dr. Jansen, previously explained, *Braden-Harder*’s logic form triples are factual extractions of a sentence that express the semantic relation between words in the sentence. Pet. 45-47; Ex. 1003 ¶¶211-219. Moreover, for the case of noun modifiers, these logic form triples are expressed in the same form as Uniloc’s new, narrower construction of keyfact. *See* Pet. 47, *and* Ex. 1003 ¶¶221-222. Not only does Uniloc fail to provide any contrary evidence or expert testimony, but Uniloc also fails to address, let alone dispute, the relevant portions of Google’s Petition and expert testimony. Thus, the challenged

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