UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC

Petitioner

v.

UNILOC 2017 LLC

Patent Owner

IPR2020-00755

PATENT 6,366,908

PATENT OWNER RESPONSE TO PETITION

TABLE OF CONTENTS

EXHIBIT LIST

Exhibit	Description
2001	Google's Invalidity Contentions in *Uniloc 2017 LLC v. Google LLC*, No. 2:18-cv-553 (E.D. Tex.), dated August 26, 2019.
2002	Exhibit A-18 to Google's Invalidity Contentions in *Uniloc 2017 LLC v. Google LLC*, No. 2:18-cv-553 (E.D. Tex.), dated August 26, 2019.

I.   INTRODUCTION

Uniloc 2017 LLC ("Uniloc" or "Patent Owner") submits this Response to the Petition for *Inter Partes* Review ("Pet." or "Petition") of United States Patent No. 6,366,908 ("the '908 patent" or "Ex. 1001") filed by Google LLC ("Google" or "Petitioner") in IPR2020-00755. The Petition fails to prove obviousness of the claims challenged therein—i.e., independent claim 6 and claims 7–12 depending therefrom.

II.   OVERVIEW OF THE '908 PATENT

The '908 patent, titled "Keyfact-Based Text Retrieval System, Keyfact-based Text Index Method, and Retrieval Method," issued on April 2, 2002 and claims priority to a foreign counterpart application filed on Dec. 30, 1999—*two decades ago*.

In general, the '908 patent describes keyfact-based search techniques. Words in a document of a document collection (or words in a search query) can be analyzed to extract keywords. *See*, *e.g.*, '908 patent, 5:19–6:4, Fig. 3, Abstract. Keyfacts can then be extracted from the keywords. *Id.*, 6:5–55, Fig. 3, Abstract. Indexing of the document collection can result in a list of keyfacts for a document and statistics regarding those keyfacts. *Id.*, 4:66–5:6, Fig. 4, Abstract. Queries can be parsed for keyfacts and information can be retrieved from the document collection based on keyfacts. *Id.*, 7:36–8:24, Fig. 5, Abstract.

Given the significance of the "keyfact" concept to the claimed invention at issue, an overview of certain relevant disclosure pertaining to the extraction of "keyfacts" from an input sentence is warranted. One example embodiment is explained in the context of extracting "keyfacts" from the input sentence, "the fast

retrieval of the distributed information." *Id.*, 5:49–6:55. The exemplary process includes applying tags to the input sentence as follows: "S (stop-word) A (adjective) NV (vocative noun) PO (possessive preposition) S (stop-word) V-ed (verb) NV (vocative noun)." *Id.*, 5:51–53. Merely applying a morphological analysis to the input sentence does not result in the generation of a keyfact, however.

The example process further involves *converting* certain tags into a keyfact tag "MP" and others (*i.e.*, those representing a "sequence of nouns") into a distinct keyfact tag "KEY". *Id.*, 5:53–57. The conversion result is expressed as "NMP KEY PO MP KEY". This conversion result still is not identified as being a "keyfact" as claimed, even though it is a syntactic representation of the input sentence. Additional example processing (using part-of-speech tagging) results in the sequence of tags "MP KEY PO MP KEY"—which is still not described as a "keyfact" as claimed. *Id.*, 5:61–6:4.

In this example, the processed "sequence of tags 'MP KEY PO MP KEY" obtained from 'the fast retrieval of the distributed information' is applied to the keyfact pattern rule and the keyfact pattern 'MP1 KEY1PO MP2 KEY2' is the result." *Id.*, 6:34–37. This *keyfact pattern* is still not described as being a "keyfact" itself. Rather, the *keyfact pattern* is used an input at a keyfact generation stage 35 to generate a list of *keyfact terms* that each have the form of [object, property]—i.e., a paired relationship between an "object" that is the head and a "property" that is the modifier. *Id.*, 6:38–44; *see also id.*, 1:16–18. Thus, in the disclosed example, applying the keyfact pattern "MP1 KEY1PO MP2 KEY2" to the keyfact generation

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