Filed on behalf of

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Petitioners HTC Corporation and HTC America, Inc.

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### UNITED STATES PATENT AND TRADEMARK OFFICE

### **BEFORE THE PATENT TRIAL AND APPEAL BOARD**

HTC CORPORATION and HTC AMERICA, INC.,

Petitioners v.

ANCORA TECHNOLOGIES, INC.

Patent Owner.

Case No. IPR2021-00570 U.S. Patent 6,411,941 B1

## PETITION FOR INTER PARTES REVIEW **OF U.S. PATENT NO. 6,411,941**

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	5.	Claim 1.a: "selecting a program residing in the volatile memory,"	.32
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3.	Claim 1. preamble: "A method of restricting software operation within a license for use with a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area; the method comprising the steps of:"
4.	Claim 1.a: "selecting a program residing in the volatile memory,"
5.	Claim 1.b: "using an agent to set up a verification structure in the erasable, non-volatile memory of the BIOS, the verification structure accommodating data that includes at least one license record,"
6.	Claim 1.c: "verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and"
7.	Claim 1.d: "acting on the program according to the verification."
8.	Claim 2: "A method according to claim 1, further comprising the steps of: establishing a license authentication bureau."
9.	Claim 3 preamble: "A method according to claim 2, wherein setting up a verification structure further comprising the steps of:"
10.	Claim 3.a: "establishing, between the computer and the bureau, a two-way data-communications linkage;"48
11.	Claim 3.b: "transferring, from the computer to the bureau, a request-for-license including an identification of the computer and the license-record's contents from the selected program;"
12.	Claim 3.c: "forming an encrypted license-record at the bureau by encrypting parts of the request-for-license using part of the identification as an encryption key;"
13.	Claim 3.d: "transferring, from the bureau to the computer, the encrypted license-record; and"

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14.	Claim 3.e: "storing the encrypted license record in the erasable non-volatile memory area of the BIOS."
15.	Claim 6: "A method according to claim 1 wherein selecting a program includes the steps of: establishing a licensed-software-program in the volatile memory of the computer wherein said licensed-software-program includes contents used to form the license-record."
16.	Claim 7 preamble: "A method according to claim 6 wherein using an agent to set up the verification structure includes the steps of:"
17.	Claim 7.a: "establishing or certifying the existence of a pseudo-unique key in a first non-volatile memory area of the computer; and"
18.	Claim 7.b: "establishing at least one license-record location in the first nonvolatile memory area or in the erasable, non-volatile memory area of the BIOS."
19.	Claim 8 preamble: "A method according to claim 6 wherein establishing a license-record includes the steps of:"
20.	Claim 8.a: "forming a license-record by encrypting of the contents used to form a license-record with other predetermined data contents, using the key; and"
21.	Claim 8.b: "establishing the encrypted license-record in one of the at least one established license-record locations."
22.	Claim 9 preamble: "A method according to claim 7 wherein verifying the program includes the steps of:"56
23.	Claim 9.a: "encrypting the licensed-software-program's license-record contents from the volatile memory area or decrypting the license-record in the erasable, non-volatile memory area of the BIOS, using the pseudo-unique key; and"

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