### UNITED STATES PATENT AND TRADEMARK OFFICE

## BEFORE THE PATENT TRIAL AND APPEAL BOARD

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.,

Petitioners,

v.

Ancora Technologies, Inc.,

Patent Owner.

PTAB Case No. IPR2021-00583

Patent No. 6,411,941 B1

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

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		1.	Overview of Hellman	
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	including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area; the method comprising the steps of:"
5.	Claim 1.a: "selecting a program residing in the volatile memory,"
6.	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,"
7.	Claim 1.c: "verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and"
8.	Claim 1.d: "acting on the program according to the verification."
9.	Claim 2: "A method according to claim 1, further comprising the steps of: establishing a license authentication bureau."
10.	Claim 11: "A method according to claim 1 wherein the volatile memory is a RAM."
11.	Claim 13: "The method of claim 1, wherein a unique key is stored in a first non-volatile memory area of the computer."
	and II: Claims 1–3, 6–14, and 16 were obvious over the bined teachings of Hellman, Chou, and Schneck
1.	Overview of Schneck
2.	Motivations to Combine Hellman, Chou, and Schneck
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,"

B.

# TABLE OF CONTENTS (continued)

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;"
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"
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."

# TABLE OF CONTENTS (continued)

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:"
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"
24.	Claim 9.b: "comparing the encrypted licenses-software- program's license-record contents with the encrypted license-record in the erasable, non-volatile memory area of the BIOS, or comparing the license-software- program's license-record contents with the decrypted license-record in erasable non-volatile memory area of the BIOS."
25.	Claim 10: "A method according to claim 9 wherein acting on the program includes the step: restricting the

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