

Case IPR2021-00831
U.S. Patent No. 8,671,132

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MICROSOFT CORPORATION
Petitioner

v.

DAEDALUS BLUE, LLC
Patent Owner

Case IPR2021-00831

U.S. Patent No. 8,671,132
Title: SYSTEM, METHOD, AND APPARATUS FOR POLICY-BASED DATA
MANAGEMENT
Filing Date: 03/14/2003
Issue Date: 03/11/2014

DAEDALUS BLUE, LLC'S PATENT OWNER RESPONSE

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1. Microsoft failed to prove that <i>Gelb</i> is analogous art.	12
2. Microsoft failed to prove that <i>Tivoli</i> qualified as a prior art printed publication as of the '132 Patent's critical date.	34
B. Claims 15-21 and 23-25: Microsoft failed to prove that “receiving one or more attributes of a file from one of a plurality of clients, the clients	

comprising at least two different computing platforms” would have been obvious over *Gelb* in view of *Tivoli*.38

1. Microsoft failed to prove that *Gelb* alone teaches, suggests, or discloses “receiving one or more attributes of a file from one of a plurality of clients, the clients comprising at least two different computing platforms.”38

2. Microsoft failed to prove that an ordinarily skilled artisan would have been motivated to combine *Gelb* and *Tivoli* to “receiv[e] one or more attributes of a file from one of a plurality of clients, the clients comprising at least two different computing platforms.”39

C. Claim 18: Microsoft failed to prove that “assigning the storage pool to the file comprises applying the storage pool rule to the characteristics of the available storage pools to assign the storage pool to the file” would have been obvious over *Gelb* in view of *Tivoli*.45

V. Ground 2: Microsoft failed to prove that Claim 22 would have been obvious over *Gelb* in view of *Tivoli* and *Callaghan*.50

VI. Ground 3: Microsoft failed to prove that *Devarakonda* anticipates Claims 15-21 and 23-25.55

VII. Conclusion59

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