UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC,

Petitioners,

v.

TRAXCELL TECHNOLOGIES, LLC,

Patent Owner.

IPR2022-00442 (Patent No. 10,820,147)

PATENT OWNER TRAXCELL TECHNOLOGIES, LLC'S PRELIMINARY RESPONSE TO PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 10,820,147

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, Virginia 22313-1450



TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	TRAXCELL AND THE INVENTION OF THE '147 PATENT	1
III.	OVERVIEW OF THE '147 PATENT (EX. 1001)	2
A.	The '147 Patent File History	2
B.	Claim Construction	4
IV. I	PERSON OF SKILL IN THE ART	6
V.	THE ASSERTED PRIOR ART	6
A.	Myr (Ex. 1007)	6
B.	Yiu (Ex. 1006)	8
C.	Machida (Ex. 1009)	8
D.	Uehara (Ex. 1005)	9
VI. I	PETITIONER HAS NOT DEMONSTRATED A REASONABLE LIKELIHOOD OF SUCCESS FOR THE GROUNDS ADVANCED PETITION	
A.	Requirements for Showing Obviousness Under 35 U.S.C. § 103	
В.	Petitioner Fails to Establish in Ground I that Challenged Claims 1, 5-8	3, 11-12,
	and 17-19 are Obvious Over Myr in View of Yiu	12
]	1. Claim 1	
2	2. Claims 5, 7 and 8	
3	3. Claim 11	
۷	4. Claims 12 and 17-19	24
C.	Petitioner Fails to Establish in Ground II that Challenged Claims 2, 6,	13, 16
	and 22 are Obvious Over Myr in View of Yiu and Machida	24
1	1. Claims 2 and 6	24
2	2. Claims 13 and 16	
2	3. Claim 22	27



D. Petitioner Fails to Establish in Ground III that Challenged Claims 1, 5, 7,	, 8,
11-12 and 17-19 are Obvious Over Uehara in View of Yiu and Myr	28
1. Claim 1	28
2. Claim 11	32
3. Claims 5 and 7-8	33
4. Claims 12 and 17-19	33
E. Petitioner Fails to Establish in Ground IV that Challenged Claim 22 is	
Obvious Over Uehara in View of Yiu, Myr and Machida	33
VII. CONCLUSION	34



TABLE OF AUTHORITIES

Cases

Broadcom Corp. v. Emulex Corp., 732 F.3d 1325 (Fed. Cir. 2013)	12
Graham v. John Deere Co., 383 U.S. 1 (1966)	11, 22
Innogenetics, N.V. v. Abbott Labs., 512 F.3d 1363 (Fed. Cir. 2008)	12
Intelligent Bio-Sys., Inc. v. Illumina Cambridge Ltd., 821 F.3d 1359 (Fed.	Cir.
2016)	12
Los Angeles Biomedical Res. Inst. at Harbor-UCLA Med. Ctr. v. Eli Lilly	Co., 849
F.3d 1049 (Fed. Cir. 2017)	12
Pers. Web Techs., LLC v. Apple, Inc., 848 F.3d 987 (Fed. Cir. 2017)	11
CFMT, Inc. v. Yieldup Intern. Corp., 349 F.3d 1333, 1342 (Fed. Cir. 2003))22
Orthopedic Equip. Co. v. United States, 702 F.2d 1005, 1012, 217 USPQ	193, 199
(Fed. Cir. 1983)	31
Statutes	
35 U.S.C. § 103	11
35 U.S.C. § 282(b)	4
Rules	
37 C.F.R. § 42.100(b)	4



27 C E D	42.1071
3/ U. P. K.	4/ 10/
<i>J</i> / <i>C</i> · I · I · I · ·	12:1V;



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

