

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CODE200, UAB; TESO LT, UAB; METACLUSTER LT, UAB; AND
OXYSALES, UAB, Petitioners,

v.

LUMINATI NETWORKS LTD.,
Patent Owner.

Case IPR2020-01358
Patent No. 10,484,510

**PETITION FOR INTER PARTES REVIEW
OF U.S. PATENT NO. 10,484,510**

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	STATUTORY PREDICATES.....	2
	A. Mandatory Notices (37 CFR § 42.8).....	2
	1. Real Parties-In-Interest.....	2
	2. Related Matters.....	2
	3. Lead and Back-Up Counsel.....	4
	4. Service Information.....	4
	B. Payment of Fees (37 CFR § 42.103).....	5
	C. Certification of Standing (37 CFR § 42.104(a)).....	5
	D. Identification of Challenges (37 CFR § 42.104(b)(1)-(2)).....	5
III.	INSTITUTION SHOULD BE GRANTED (35 U.S.C. § 314(a)).....	6
	A. Factor 1.....	7
	B. Factor 2.....	7
	C. Factor 3.....	8
	D. Factor 4.....	8
	E. Factor 5.....	9
	F. Factor 6.....	9
IV.	OVERVIEW OF THE PATENT.....	9
	A. Claims.....	9
	B. Specification.....	10
	C. Priority Date.....	12
	D. Alleged Benefit of the Patent.....	12
V.	LEVEL OF SKILL IN THE ART.....	12
VI.	CLAIM CONSTRUCTION (37 CFR § 42.104(b)(3)).....	13
VII.	OVERVIEW OF PRIOR ART REFERENCES.....	15
	A. Crowds.....	15
	B. MorphMix.....	15
	C. Border.....	16
	D. RFC 2616.....	16

c)	Claim step (b) (“sending, to the web server over an Internet, the first content identifier ”).....	44
d)	Claim step (c) (“receiving, the first content from the web server over the Internet in response to the sending of the first content identifier”) ...	45
e)	Claim step (d) (“sending the received first content, to the second server over the established TCP connection, in response to the receiving of the first content identifier”).....	46
2.	Claim 6	47
3.	Claim 10	47
4.	Claim 15	48
5.	Claim 16	49
6.	Claim 17	49
7.	Claims 18-19.....	50
8.	Claim 20	50
9.	Claim 23	50
10.	Claim 24	51
D.	GROUND 4: OBVIOUSNESS OF CLAIMS 1, 6, 8-11, 13, 15-20, AND 22-24 BY BORDER + RFC 2616 + GENERAL KNOWLEDGE	52
1.	Claim 1	53
2.	Claims 8-9.....	54
3.	Claim 11	56
4.	Claim 13	57
5.	Claim 22	58
6.	Claims 6, 10, 15-20, and 23-24	58
E.	GROUND 5: ANTICIPATION OF CLAIMS 1-2, 6-8, 13, 15-16, AND 18-23 BY MORPHMIX.....	59
1.	Claim 1	60
a)	Preamble	60
b)	Claim step (a) (“establishing a Transmission Control Protocol (TCP) connection with a second server”).....	60
c)	Claim step (b) (“sending, to the web server over an Internet, the first content identifier”).....	64
d)	Claim step (c) (“receiving, the first content from the web server over the Internet in response to the sending of the first content identifier”)	66
e)	Claim step (d) (“sending the received first content, to the second server over the established TCP connection, in response to the receiving of the first content identifier”)	66

2.	Claim 2	67
3.	Claim 6	67
4.	Claims 7 and 21	69
5.	Claim 8	70
6.	Claim 13	71
7.	Claim 15	72
8.	Claim 16	72
9.	Claims 18-19.....	72
10.	Claim 20	72
11.	Claim 22	73
12.	Claim 23	73
F.	GROUND 6: OBVIOUSNESS OF CLAIMS 1-2, 6-11, 13, 15-16, AND 18-23 BY MORPHMIX + RFC 2616 + GENERAL KNOWLEDGE.....	74
1.	Claim 1	74
2.	Claim 9	75
3.	Claims 10-11.....	76
4.	Claims 2, 6-8, 13, 15-16, and 18-23	77

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.