UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC, Petitioner,

v.

DYNAPASS IP HOLDINGS LLC, Patent Owner.

> IPR2023-00425 Patent 6,993,658

PETITIONER'S REPLY



TABLE OF CONTENTS

I. IN	TRODUCTION	1
II. CI	LAIM CONSTRUCTION	1
III. GI	ROUNDS	2
A.	Veneklase and Jonsson	2
1	. Limitation [5.3]	2
2	Limitation [5.4]	5
3	. Limitation [5.5]	6
4	Limitation [5.6]	7
B.	Kew and Sormunen	11
1	. Limitation [5.3]	11
2	Limitation [5.6]	16
3	Limitation [1.2]	23
IV. TH	HE BOARD HAS JURISDICTION	24
V CO	ONCLUSION	24



EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent 6,993,658
1002	Prosecution History File of Application 09/519,829
1003	Declaration of Bruce McNair (¶¶1-168)
1004	Curriculum Vitae of Bruce McNair
1005	European Patent Application No. 084451 to Veneklase ("Veneklase")
1006	PCT Patent Publication No. WO 96/00485 to Jonsson ("Jonsson")
1007	PCT Patent Publication No. WO 95/19593 to Kew ("Kew")
1008	PCT Patent Publication No. WO 97/31306 to Sormunen ("Sormunen")
1009	Li Gong, "Optimal Authentication Protocols Resistant to Password Guessing Attacks," Proceedings The Eighth IEEE Computer Security Foundations Workshop, 1995, pp. 24-29, doi: 10.1109/CSFW.1995.518549.
1010	U.S. Patent 3,938,091
1011	IETF RFC2289, "A One-Time Password System," February 1989, available at https://www.rfc-editor.org/rfc/rfc2289.html
1012	U.S. Patent 5,276,444



1013	S.A. Sherman, R. Skibo, R.S. Murray, "Secure Network Access Using Multiple Applications of AT&T's Smart Card," AT&T Technical Journal, September/October 1994
1014	Lt. Gen. Charles R. Myers, "Vietnam Studies: Division-Level Communications, 1962-1973", US Department of the Army, 1982, Ch. 8, retrieved from https://history.army.mil/catalog/pubs/90/90-11.html December 13, 2022.
1015	Z. J. Haas and S. Paul, "Limited-lifetime shared-access in mobile systems," Proceedings IEEE International Conference on Communications ICC '95, 1995, pp. 1404-1408 vol.3, doi: 10.1109/ICC.1995.524434
1016	Mobivity, A Brief History of Text Messaging, Sept. 27, 2012, available at https://www.mobivity.com/mobivity-blog/a-brief-history-of-text-messaging
1017	Declaration of Kevin Jakel (¶¶115)
1018	Microsoft Computer Dictionary (5th ed. 2002)
1019	U.S. Patent 7,058,974
1020	U.S. Patent 5,559,505
1021	"Viet Nam Studies – Division-Level Communications 1962-1973," Department of the Army, CMH PUB 90-11, 1982.
1022	"Recent-secure authentication: enforcing revocation in distributed systems," <i>Proceedings 1995 IEEE Symposium on Security and Privacy</i> , Oakland, CA, USA, 1995, pp. 224-235, doi: 10.1109/SECPRI.1995.398935
1023	"A class of flexible and efficient key management protocols," <i>Proceedings 9th IEEE Computer Security Foundations Workshop</i> , Kenmare, Ireland, 1996, pp. 2-8, doi: 10.1109/CSFW.1996.503685



1024	Supplemental Declaration of Bruce McNair



DOCKET A L A R M

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.

