

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS, LLC,

Petitioner,

v.

DYNAPASS IP HOLDINGS, LLC

Patent Owner.

***Inter Partes* Review No. IPR2023-00425**

Patent No. 6,993,658

**PATENT OWNER'S PRELIMINARY RESPONSE TO THE PETITION
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,993,658
PURSUANT TO 37 C.F.R. § 42.107**

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EXHIBIT LIST

Exhibit	Description
2001	Google Patents webpage for U.S. Patent No. 6,993,658, https://patents.google.com/patent/US6993658B1/

I. INTRODUCTION

Dynapass IP Holdings, LLC (“Patent Owner”) respectfully submits this Preliminary Response (the “Response”) to the Petition for *Inter Partes* Review of U.S. Patent No. 6,993,658 (IPR2023-00425, the “Petition” or “Pet.”) filed by Unified Patents, LLC (“Petitioner”). The ’658 Patent relates to “the authentication of users of secure systems and, more particularly, the invention relates to a system through which user tokens required for user authentication are supplied through personal communication devices such as mobile telephones and pagers.” Ex. 1001 at 1:7-11.

Institution should be denied because the Petition fails to demonstrate a reasonable likelihood that any challenged claim of the ’658 Patent is unpatentable. As detailed herein, the combination of references applied by the Petition against the independent claims of the ’658 Patent has numerous glaring deficiencies. For example, the independent claims require activation of the user’s account in response to creation of a new “password” for the user (the “password” in the claims is “based at least upon a token and a passcode”). The account remains active until the expiration of “a predetermined amount of time after activating the account.” That process is depicted in Figure 5, a portion of which is reproduced below:

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