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 RESPONSE TO THE PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,993,658

Filed on behalf of Patent Owner by:

John Wittenzellner (Reg. No. 61,662) 1735 Market Street, Suite 125, #453 Philadelphia, PA 19103

Todd E. Landis (Reg. No. 44,200) 2633 McKinney Ave., Suite 130 Dallas, TX 75204

Mark McCarthy (Reg. No. 69,575) 601 Congress Ave., Suite 600 Austin, TX 78701

WILLIAMS SIMONS & LANDIS PLLC



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		ii.	[5.4] "a communication module configured to transmit the token to the personal communication device through the cell phone network"		
		iii.	[5.5] "an authentication module configured to receive the password from the user through a secure computer network"		
		iv.	[5.6] "wherein the authentication module activates access to the account in response to the password and deactivates the account within a predetermined amount of time after activating the account"		
	B.		The Combination of Kew and Sormunen Does Not vious Claims 1 and 3-6 of the '658 Patent38		
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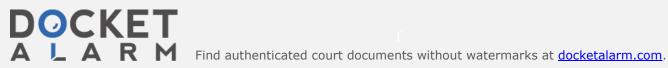


EXHIBIT LIST

Exhibit	Description	
2001	Google Patents webpage for U.S. Patent No. 6,993,658,	
	https://patents.google.com/patent/US6993658B1/	
2002	"Preliminary Constructions," Dynapass IP Holdings, LLC v.	
	JPMorgan Chase & Co., et al., No. 2:22-cv-00212-JRG-RSP (E.D.	
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