

Petition for *Inter Partes* Review of
U.S. Patent No. 10,289,607

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BOX, INC., and DROPBOX, INC.,
Petitioners

v.

TOPIA TECHNOLOGY, INC.,
Patent Owner

Case No. IPR2023-00429

U.S. Patent No. 10,289,607

Filing Date: June 25, 2018

Issue Date: May 14, 2019

Title: Architecture for Management of Digital Files Across Distributed Network

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 10,289,607**

Table of Contents

	Page
I. Introduction.....	1
II. Mandatory Notices (§ 42.8(a)(1))	1
A. Real Parties-In-Interest (§ 42.8(b)(1)).....	1
B. Related Matters (§ 42.8(b)(2))	1
C. Lead and Back-Up Counsel (§ 42.8(b)(3))	2
D. Service Information (§ 42.8(b)(4)).....	3
III. Fee Payment (§ 42.103).....	4
IV. Requirements Under §§ 42.104 and 42.108 and Considerations Under §§314(a)/325(d).....	4
A. Grounds for Standing	4
B. Identification of Challenge and Statement of Precise Relief Requested	4
C. Considerations Under §§314(a)/325(d).....	5
V. Overview of '607 Patent.....	5
VI. Level of Ordinary Skill in the Art	5
VII. Claim Construction.....	6
VIII. The Challenged Claims are Unpatentable	6
A. Earliest Effective Filing Date.....	6
B. Overview of Grounds Including Prior Art Qualification	7
C. Summary of Prior Art.....	8
B. Ground 1: Obviousness over Sigurdsson with Shappell and Rao.....	11

Table of Contents

(continued)

	Page
C. Ground 2: Obviousness over Brown with Hesselink, Shappell, and Rao.....	45
IX. Conclusion	69

List of Exhibits

Exhibit No.	Description of Document
1001	U.S. Patent No. 9,143,561 (“’561” or “’561 patent”)
1002	U.S. Patent No. 10,067,942 (“’942” or “’942 patent”)
1003	U.S. Patent No. 10,289,607 (“’607” or “’607 patent”)
1004	U.S. Patent No. 10,642,787 (“’787” or “’787 patent”)
1005	U.S. Patent No. 10,754,823 (“’823” or “’823 patent”)
1006	U.S. Patent No. 11,003,622 (“’622” or “’622 patent”)
1007	Prosecution History of the ’561 Patent
1008	Prosecution History of the ’942 Patent
1009	Prosecution History of the ’607 Patent
1010	Prosecution History of the ’787 Patent
1011	Prosecution History of the ’823 Patent
1012	Prosecution History of the ’622 Patent
1013	Case No. IPR2022-00782, Paper No. 1, Petition for IPR
1014	Case No. IPR2022-00782, Paper No. 17, Decision Granting Institution of IPR (Redacted – Public Version)
1015	U.S. Provisional Patent Application No. 60/986,896 (“’896 provisional”)
1016	U.S. Patent Application Publication No. 2007/0174246 A1 to Johann Tomas Sigurdsson, et al. (“Sigurdsson”)
1017	File History of U.S. Patent Application Publication No. 2007/0174246 A1 to Johann Tomas Sigurdsson, et al. (“Sigurdsson File History”)
1018	U.S. Patent No. 7,734,690 B2 to George P. Moromisato, et al. (“Moromisato”)
1019	U.S. Patent Application Publication No. 2006/0190506 A1 to Rajesh M. Rao, et al. (“Rao”)
1020	U.S. Patent Application Publication No. 2005/0091289 A1 to Michael Shappell, et al. (“Shappell”)
1021	Microsoft Computer Dictionary (5th ed. 2002) (excerpts)
1022	Jim Boyce, <i>Microsoft Outlook Version 2002 Inside Out</i> (2001) (“Boyce”) (excerpts)
1023	European Patent Application Publication No. EP 1,621,990 A2 to Kitamaru, et al. (“Kitamaru”)
1024	U.S. Patent No. 5,923,325 to Ronald Jason Barber and Edwin Joseph Selker (“Barber”)
1025	U.S. Patent No. 7,035,847 B2 to David K. Brown, et al. (“Brown”)

List of Exhibits

Exhibit No.	Description of Document
1026	U.S. Patent Application Publication No. 2005/0120082 A1 to Lambertus Hesselink, et al. (“Hesselink”)
1027	<i>Topia Technology, Inc. v. Box, Inc.</i> , Case No. 6:21-cv-1372-ADA, D.I. 60 (Joint Claim Construction Chart)
1028	Declaration of Dr. Ravin Balakrishnan

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.