Exhibit 19

THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re PATENT APPLICATION of

Applicants	:	Miki MULLOR et al.	) Customer No.
Appln. No.	:	09/164,777	) 26694
Filed	:	October 1, 1998	) PATENT TRADEMARK OFFICE
For	:	METHOD OF RESTRICTING SOFTWARE OPERATION WITHIN A LICENSED LIMITATION	)
Group Art Unit	:	2161	
Examiner	:	J. Trammell	
Atty. Dkt.	:	39636-176166	

Assistant Commissioner for Patents
Washington, D.C. 22031

AMENDMENT

Sir:

REQUEST FOR EXTENSION OF TIME

Please extend the period for responding to the Office Action dated June 22, 2001 by two months so that the due date expires November 22, 2001. The requisite extension fee of $200.00 under 37 C.F.R. 1.17 (a) (1) is attached. Should no check be attached, please charge our Deposit Account 22-0261. Please also deduct any additional fees due or credit any overage to the same account.

Responsive to the Office Action dated June 22, 2001, please amend the application as follows

12/14/2001 HDESTA1 00000006 220261 09164777
01 FC:203 27.00 CH

11/15/2001 EABUBAK1 00000001 09164777
02 FC:216 200.00 OP

IN THE CLAIMS:

Please amended the claims as follows:

1. (Twice Amended) A method of restricting software operation within a license for use with a computer including an erasable, non-volatile memory area of a BIOS of the computer, and a volatile memory area; the method comprising the steps of:

selecting a program residing in the volatile memory,

using an agent to set up a verification structure in the erasable, non-volatile memory of the BIOS, the verification structure accommodating data that includes at least one license record,

verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and

acting on the program according to the verification.

3. (Amended) A method according to claim 2, wherein setting up a verification structure further comprising the steps of: establishing, between the computer and the bureau, a two-way data-communications linkage; transferring, from the computer to the bureau, a request-for-license including an identification of the computer and the license-record's contents from the selected program; forming an encrypted license-record at the bureau by encrypting parts of the request-for-license using part of the identification as an encryption key; transferring, from the bureau to the computer, the encrypted license-record; and storing the encrypted license record in the erasable non-volatile memory area of the BIOS.

4. (Amended) A method according to claim 2, wherein verifying the program further comprises the steps of: establishing, between the computer and the bureau, a two-way data-communications linkage; transferring, from the computer to the bureau, a request-for-

license verification including an identification of the computer, an encrypted license-record for the selected program from the erasable, non-volatile memory area of the BIOS, and the program's license-record; enabling the comparing at the bureau; and transferring, from the bureau to the computer, the result of the comparing.

5. (Amended) A method according to claim 3 wherein the identification of the computer includes the unique key.

6. (Amended) A method according to claim 1 wherein selecting a program includes the steps of: establishing a licensed-software-program in the volatile memory of the computer wherein said licensed-software-program includes contents used to form the license-record.

7. (Amended) A method according to claim 6 wherein using an agent to set up the verification structure includes the steps of: establishing or certifying the existence of a pseudo-unique key in a first non-volatile memory area of the computer; and establishing at least one license-record location in the first nonvolatile memory area or in the erasable, non-volatile memory area of the BIOS.

9. (Amended) A method according to claim 7 wherein verifying the program includes the steps of: encrypting the licensed-software-program's license-record contents from the volatile memory area or decrypting the license-record in the erasable, non-volatile memory area of the BIOS, using the pseudo-unique key; and comparing the encrypted licenses-software-program's license-record contents with the encrypted license-record in the erasable, non-volatile

memory area of the BIOS, or comparing the license-software-program's license-record contents with the decrypted license-record in erasable non-volatile memory area of the BIOS.

10. (Amended) A method according to claim 9 wherein acting on the program includes the step: restricting the program's operation with predetermined limitations if the comparing yields non-unity or insufficiency.

11. (Amended) ~~A~~ method according to claim 22 wherein the first non-volatile memory area is a ROM section of a ~~BIOS~~.

12. (Amended) A method according to claim 1 wherein the erasable, non-volatile memory area is a E^2PROM section of the BIOS.

16. (Amended) The method of Claim 22, wherein the unique key includes a pseudo-unique key.

17. (Amended) The method according Claim 22, wherein the step of using the agent to set up the verification record, including the license record, includes encrypting a license record data in the program using at least the unique key.

18. (Amended) The method according to Claim 22, wherein the step of verifying the program includes a decrypting the license record data accommodated in the erasable second non-volatile memory area of the BIOS using at least the unique key.

19. (Amended) The method according to Claim 22, wherein the step of verifying the program includes encrypting the license record that is accommodated in the program using at least the unique key.

20. (Amended) A method for accessing a software program using a pseudo-unique key stored in a first non-erasable non-volatile memory area of a computer, the first non-volatile memory area being unable to be programmatically changed, the method, comprising:

loading a software program residing in a volatile memory area of the computer;

extracting license information from the software program;

encrypting license information using the pseudo-unique key stored in the first non-volatile memory area;

storing the encrypting license information in a second erasable, writable, non volatile memory area of the BIOS of the computer;

subsequently verifying the software program based on the encrypted license information stored in the second erasable, writable, non-volatile memory area of the BIOS; and

acting on the software program based on the verification.

Please add the following new claims:

21. (New) The method of claim 20, wherein the verification comprises:

extracting the license information from the software program;

encrypting the license information using the pseudo-unique key stored in the first non-volatile memory area of the computer to form second encrypted license information; and

comparing the encrypted license information stored in the second erasable, writable, non-volatile memory area of the BIOS of the computer with the second encrypted license information.

22. (New) The method of claim 1, wherein a unique key is stored in a first non-volatile memory area of the computer.

23. (New) The method according to claim 17, wherein the verification comprises:

extracting the license record from the software program;

encrypting the license record using the unique key stored in the first non-volatile memory area of the computer to form second encrypted license information; and

comparing the encrypted license information stored in the erasable, non-volatile memory area of the BIOS of the computer with the second encrypted license information.

REMARKS

Claims 1-13 and 16-23 are now pending in this application. New claims 21-23 have been added by this amendment. Each of the pending claims is believed to define an invention which is novel and unobvious over the cited references. Favorable reconsideration of this case is respectfully requested.

Applicant's representative appreciates the Examiner's courtesy in conducting a personnel interview in this case. The claims have been amended as agreed upon during the interview and it is respectfully submitted that this application is now in condition for allowance.

Specifically, claim 1 has been amended to recite that the verification structure is stored in an erasable, non-volatile memory area of the BIOS. This claim amendment overcomes the rejections under 35 U.S.C. 112, first paragraph in sections 3, 4 and 5 of the Final Office Action, as well as the rejection under 35 U.S.C. 112, second paragraph in section 7 of the Final Office Action.

Claim 20 has been amended to correct the informality noted by the Examiner. In view of these amendments, it is respectfully submitted that all pending claims are now in all aspects in compliance with 35 U.S.C. 112, first paragraph and 35 U.S.C. 112, second paragraph. Therefore, the withdrawal of these rejections is respectfully requested.

Claims 1-4, 6 and 10-13 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 5,892,900 to Ginter et al.

Claims 5 and 7-9, and 16-20 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Ginter et al. in view of U.S. Patent No. 5,684,951 to Goldman et al.

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Consequently, it is clear that the cited references do not anticipate or render the present claims obvious. Therefore, the withdrawal of this rejection is respectfully requested.

As requested by the Examiner during the interview, a description of a specific embodiment of the invention is attached hereto.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned "**Version with markings to show changes made.**"

In view of the foregoing, reconsideration and allowance of this application are believed in order, and such action is earnestly solicited.

The Commissioner is authorized to charge any fee necessitated by this Amendment to our Deposit Account No. 22-0261.

Respectfully submitted,

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS:

Please amended the claims as follows:

1. (Twice Amended) A method of restricting software operation within a license for use with a computer including an ~~first, non-erasable, non-volatile memory area, a second, non-~~erasable, non-volatile memory area of a (BIOS) of the computer, and a volatile memory area; ~~the first non-volatile memory accomodates data that includes unique key;~~ the method comprising the steps of:

selecting a program residing in the volatile memory,

using an agent to set~~ting~~ up verification structure in the ~~second~~ erasable, non-volatile memory of the BIOS, the ~~verfication~~ verification structure accommodatinge~~s~~ data that includes at least one license record,

verifying the program using at least ~~said~~ the verification structure from the erasable non-volatile memory of the BIOS, and

acting on the program according to the verification.

3. (Amended) A method according to claim 2, wherein setting up a verification structure further comprising the steps of: establishing, between the computer and the bureau, a two-way data-communications linkage; transferring, from the computer to the bureau, a request-for-license including an identification of the computer and the license-record's contents from the selected program; forming an encrypted license-record at the bureau by encrypting parts of the request-for-license using part of the identification as ~~the~~ an encryption key; ~~and~~ transferring, from the bureau to the computer, the encrypted license-record; and storing the encrypted license record in the erasable non-volatile memory area of the BIOS.

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4. (Amended) A method according to claim 2, wherein verifying the program further comprises~~ing~~ the steps of: establishing, between the computer and the bureau, a two-way data-communications linkage; transferring, from the computer to the bureau, a request-for-license verification including an identification of the computer, ~~the~~ an encrypted license-record for the selected program from the ~~second~~ erasable, non-volatile memory area of the BIOS, and the ~~license-software-~~program's license-record ~~contents~~; enabling the comparing at the bureau; and transferring, from the bureau to the computer, the result of the comparing.

5. (Amended) A method according to claim 3 wherein the identification of the computer includes the ~~pseudo-~~unique key.

6. (Amended) A method according to claim 1 wherein selecting a program includes the steps of: establishing a licensed-software-program in the volatile memory of the computer wherein said licensed-software-program includes contents used to form ~~a~~ the license-record.

7. (Amended) A method according to claim ~~1~~ 6 wherein using an agent to set~~ting~~ up the verification structure includes the steps of: establishing or certifying the existence of a pseudo-unique key in ~~the~~ a first non-volatile memory area of the computer; and establishing at least one license-record location in the first ~~or the second~~ nonvolatile memory area or in the erasable, non-volatile memory area of the BIOS.

9. (Amended) A method according to claim 7~~1~~ wherein verifying the program

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includes the steps of: encrypting the licensed-software-program's license-record contents from the volatile memory area or decrypting the license-record in the ~~first or the second~~ erasable, non-volatile memory area of the BIOS, using the pseudo-unique key; and comparing the encrypted licenses-software-program's license-record contents with the encrypted license-record in the ~~first or the second~~ erasable, non-volatile memory area of the BIOS, or comparing the license-software-program's license-record contents with the decrypted license-record in ~~the first or the second~~ erasable non-volatile memory area of the BIOS.

10. (Amended) A method according to claim 9~~1~~ wherein acting on the program includes the step: restricting the program's operation with predetermined limitations if the comparing yields non-unity or insufficiency.

11. (Amended) A method according to claim 22~~1~~ wherein the first non-volatile memory area is a ROM section of a BIOS.

12. (Amended) A method according to claim 1 wherein the ~~second~~ erasable, non-volatile memory area is a E^2PROM section of ~~a~~ the BIOS.

16. (Amended) The method of Claim 22~~1~~, wherein the unique key includes a pseudo-unique key.

17. (Amended) The method according Claim 22~~1~~, wherein ~~said~~ the step of using the agent to set~~ting~~ up ~~a~~ the verification record, including the license record, includes encrypting a license record data in ~~said~~ the program using at least ~~said~~ the unique key.

18. (Amended) The method according to Claim 22~~1~~, wherein ~~said~~ the step of verifying the program includes a decrypting the license record data accommodated in ~~said~~ the erasable second non-volatile memory area of the BIOS using at least ~~said~~ the unique key.

19. (Amended) The method according to Claim 22~~1~~, wherein ~~said~~ the step of verifying the program includes encrypting the license record that is accommodated in ~~said~~ the program using at least ~~said~~ the unique key.

20. (Amended) A method for ~~restricting~~ accessing ~~to~~ a software program using a pseudo-unique key stored in a first non-erasable non-volatile memory area of a computer, the first non-volatile memory area being unable to be programmatically changed, the method, comprising:

~~storing a pseudo-unique key in a first non-volatile memory area of a computer;~~

~~selecting~~ loading a software program residing in a volatile memory area of the computer;

extracting license information from the software program;

encrypting license information using the pseudo-unique key stored in the first non-volatile memory area;

storing the encrypting ~~pseudo-unique key~~ license information in a second erasable, writable, non volatile memory area of the BIOS of the computer;

subsequently verifying the software program ~~using~~ based on the encrypted license information stored in the second erasable, writable, non-volatile memory area of the BIOS ~~pseudo-unique key~~; and

acting on the software program based on the verification.

Please add the following new claims:

21. (New) The method of claim 20, wherein the verification comprises:

extracting the license information from the software program;

encrypting the license information using the pseudo-unique key stored in the first non-volatile memory area of the computer to form second encrypted license information; and

comparing the encrypted license information stored in the second erasable, writable, non-volatile memory area of the BIOS of the computer with the second encrypted license information.

22. (New) The method of claim 1, wherein a unique key is stored in a first non-volatile memory area of the computer.

23. (New) The method according to claim 17, wherein the verification comprises:

extracting the license record from the software program;

encrypting the license record using the unique key stored in the first non-volatile memory area of the computer to form second encrypted license information; and

comparing the encrypted license information stored in the erasable, non-volatile memory area of the BIOS of the computer with the second encrypted license information.