

EXHIBIT 7

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ROKU, INC. and VIZIO, INC.,
Petitioners

v.

ANCORA TECHNOLOGIES INC.,
Patent Owner

Case IPR2021-01406
U.S. Patent No. 6,411,941

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,411,941**

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Petition for Inter Partes Review of U.S. Patent No. 6,411,941

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 4. Claim 1 preamble: “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:” ...33

 5. Claim 1.a: “selecting a program residing in the volatile memory,”36

 6. Claim 1.b: “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

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record,”38

7. Claim 1.c: “verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and”39

8. Claim 1.d: “acting on the program according to the verification.”40

9. Claim 2: “A method according to claim 1, further comprising the steps of: establishing a license authentication bureau.”40

10. Claim 11: “A method according to claim 1 wherein the volatile memory is a RAM.”41

11. Claim 13: “The method of claim 1, wherein a unique key is stored in a first non-volatile memory area of the computer.”...41

B. Ground II: Claims 1-3, 6-14, and 16 were obvious over the combined teachings of Hellman, Chou, and Schneck.....42

1. Overview of Schneck42

2. Motivations to Combine Hellman, Chou, and Schneck43

3. Claim 1. preamble: “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:” ...46

4. Claim 1.a: “selecting a program residing in the volatile memory,”47

5. Claim 1.b: “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,”48

6. Claim 1.c: “verifying the program using at least the verification structure from the erasable non-volatile memory of the BIOS, and”50

7. Claim 1.d: “acting on the program according to the verification.”51

8. Claim 2: “A method according to claim 1, further comprising the steps of: establishing a license authentication bureau.”51

9. Claim 3 preamble: “A method according to claim 2, wherein setting up a verification structure further comprising the steps

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of:”51

10. Claim 3.a: “establishing, between the computer and the bureau, a two-way data-communications linkage;”51

11. Claim 3.b: “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;” 52

12. Claim 3.c: “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;”55

13. Claim 3.d: “transferring, from the bureau to the computer, the encrypted license-record; and”55

14. Claim 3.e: “storing the encrypted license record in the erasable non-volatile memory area of the BIOS.”56

15. Claim 6: “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.”56

16. Claim 7 preamble: “A method according to claim 6 wherein using an agent to set up the verification structure includes the steps of:”56

17. Claim 7.a: “establishing or certifying the existence of a pseudo-unique key in a first non-volatile memory area of the computer; and”57

18. Claim 7.b: “establishing at least one license-record location in the first nonvolatile memory area or in the erasable, non-volatile memory area of the BIOS.”57

19. Claim 8 preamble: “A method according to claim 6 wherein establishing a license-record includes the steps of:”58

20. Claim 8.a: “forming a license-record by encrypting of the contents used to form a license-record with other predetermined data contents, using the key; and”58

21. Claim 8.b: “establishing the encrypted license-record in one of the at least one established license-record locations.”58

22. Claim 9 preamble: “A method according to claim 7 wherein verifying the program includes the steps of:”59

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