Filed on behalf of Pi-Net International, Inc.

By: Bryan Boyle and Lawrence B. Goodwin

Carr&Ferrell LLP Lawrence B. Goodwin, P.C. 120 Constitution Drive 525 East 86<sup>th</sup> Street, Suite 5H

Menlo Park, CA 94025 New York, NY 10028 Tel: (650) 812-3400 Tel: (212) 988-1076 Fax: (650) 812-3444 Fax: (646) 619-4161

UNITED STATES PATENT AND TRADEMARK OFFICE

\_\_\_\_\_

BEFORE THE PATENT TRIAL AND APPEAL BOARD

\_\_\_\_\_

SAP AMERICA, INC.
Petitioner

V.

PI-NET INTERNATIONAL, INC.
Patent Owner

1 dient owner

CASE CBM2013-00013 Patent 8,037,158

PATENT OWNER'S CORRECTED RESPONSE TO THE PETITION

Mail Stop "PATENT BOARD"

Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



## **Table of Contents**

I.	Intro	duction	1			
II.	Obje	Objections to Grounds for Eligibility for Covered Business Method				
	Pater	nt Review	1			
III.	Pater	Patent Owner's Response to 35 U.S.C. § 101 Issues				
IV.	The	Claims of the '158 Patent and their Construction	17			
	A.	Web application	18			
	B.	Service network atop the World Wide Web	24			
	C.	Web user input device	27			
	D.	Utilizing a routed transactional data structure that is both				
		complete and non-deferred	28			
	E.	The routing occurring in response to the subsequent signals	37			
	F.	Object Routing	38			
	G.	Distributed on-line service information bases	42			
	H.	Virtual Information Store	42			
	I.	Point Of Service Application	44			
V.	Grou	Grounds Under Section 1035				



	A.	Obviousness in General	57
	B.	The Prior Art, Alone Or In Combination, Does Not Include	
		Elements	57
	Of C	laims 1-3 And 11, As Properly Construed	57
	C.	Hindsight Combination of Lawlor and Computerworld	63
VI.	Clair	ms 1 – 6 and 11 Are Not Indefinite.	65
VII.	Conc	lusion	68
CED'	TIFIC	ATION OF SERVICE (37 CER 42 6(a) 42 105(a))	70



### **TABLE OF AUTHORITIES**

### Cases

American Piledriving Equipment, Inc. v. Geoquip, Inc., 637 F.3d 1324, 1331 (Fed.
Cir. 2011)29
Bicon, 441 F.3d at 950
Bicon, Inc. v. Straumann Co., 441 F.3d 945, 950 (Fed. Cir. 2006)10
CLS Bank Intern. v. Alice Corp. Pty. Ltd., 685 F. 3d 1341 (Fed. Cir. 2012)10
Perkin-Elmer Corp. v. Westinghouse Elec. Corp., 822 F.2d 1528, 1532–33 (Fed.         Cir. 1987)
Phillips v. AWH Corp., 415 F.3d 1303, 1314 (Fed. Cir. 2005) (en banc)29
Renishaw PLC v. Marposs Societa' per Azioni, 158 F.3d 1243, 1248 (Fed. Cir.
1998)
Renishaw, 158 F.3d at 124839
<i>U.S. Surgical Corp.</i> , 103 F.3d at 1568
Unique Concepts, Inc. v. Brown, 939 F.2d 1558, 1562 (Fed. Cir. 199110



Unique Concepts, Inc. v. Brown, 939 F.2d 1558, 1562 (Fed. Cir. 1991)16
Statutes
§ 42.301(a)9
35 U.S.C. § 101
35 U.S.C. § 103iv
http://www.uspto.gov/web/patents/classification/uspc705/sched705.pdf11
Regulations
77 Fed. Reg. 48734 at 48739



# DOCKET

# 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.

