UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SAP AMERICA, INC.
Petitioner

v.

PI-NET INTERNATIONAL, INC.
Patent Owner

Case CBM2013-00013
Patent 8,037,158

PETITIONER'S REPLY TO PATENT OWNER'S CORRECTED RESPONSE TO PETITION

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

TABLE OF AUTHORITIES iii

LIST OF EXHIBITS iv

I. Introduction 1

II. Argument 1

A. PO's alternative constructions should not be adopted. 1

1. "Web Application" 1

2. "service network atop the World Wide Web" 3

3. "Web user input device" 4

4. "utilizing a routed transactional data structure that is both complete and non-deferred" 4

5. "object routing" 6

6. "individual networked objects" 7

7. "virtual information store" 8

8. "POSvc application" 8

B. Claims 1-3 and 11 are unpatentable under 35 U.S.C. § 101. 9

1. Claims 1-3 and 11 are abstract 9

2. PI-NET's contention that SAP and the Board ignored steps that "play a significant part in permitting the claimed method to be performed" is erroneous. 10

C. Under the proper constructions, the challenged claims of the '158 patent are unpatentable. 11

1. Lawlor in view of Computerworld teaches "utilizing a routed transactional data structure that is both complete and non-deferred" and a "web application." 11

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

2. SFCU in view of Electronic Banking teaches "utilizing a routed transactional data structure that is both complete and non-deferred" and a "web application."....14

D. Claims 1-6 and 11 are indefinite. 15

III. Conclusion 15

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF AUTHORITIES

Cases

Ball Aerosol & Specialty Container, Inc. v. Ltd. Brands, Inc.,
555 F.3d 984, 993 (Fed.Cir.2009) ……...13

Perfect Web Techs. v. Info USA, Inc.,
(Fed. Cir. 2009) ……...13

Wyers v. Master Lock Co.,
616 F.3d at 1240 (Fed. Cir. 2010)……...13

Rules

37 C.F.R.§42.6(a)(3)……..……....8

Other Authorities

77 Fed. Reg. 157 (August 14, 2012) ……..10

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

LIST OF EXHIBITS

SAP

Exhibit No.	Document Description
SAP 1001	U.S. Patent No. 8,0137,158 to Arunachalam (filed Oct. 30, 2007; issued Oct. 11, 2011) ("the '158 patent").
SAP 1002	Prosecution History of U.S. Patent No. 8,037,158
SAP 1003	Declaration of Dr. Marvin Sirbu (including Curriculum Vitae of Dr. Sirbu, attached as Appendix A; "Requirements for Internet Hosts—Communication Layers" by Braden as Appendix B; and, "Stanford Federal Credit Union Pioneers Online Financial Services" published by Business Wire as Appendix C).
SAP 1004	Lipis, A. H. et al., "Electronic Banking," The Stock Market, 4th Edition, John Wiley & Sons, New York, 1985, 227 pages.
SAP 1005	Stanford Federal Credit Union Pioneers Online Financial Services
SAP 1006	U.S. Patent No. 5,220,501 to Lawlor et al. (filed Mar. 15, 1984; issued Mar. 3, 1987).
SAP 1007	Computerworld, June 26, 1995

Currently Filed

SAP 1010	Declaration of Dr. Marvin Sirbu in Support of Petitioner's Reply to Patent Owner's Corrected Response to Petition.
SAP 1011	Patent Owner's Corrected Response in proceeding IPR2013-00194 filed Feb. 5, 2014, Paper No. 34
SAP 1012	PI-Net v. JP Morgan Chase Joint Claim Construction Chart, Case 1:12-cv-00356-RGA

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.