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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 CBM2014-00018
Patent 8,037,158

RESPONSE OF PATENT OWNER

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IV. Claims 4-6 are Patentable over Lawlor, ComputerWorld, CORBA 1, CORBA 2, SFCU, Electronic Banking, SNMP individually or in any combination and are NOT Rendered Obvious under 35 U.S.C. Section 103 35

A. Banks in 1995 had Web sites, Web pages, Web forms and Email, Not Web applications or POSvc applications displayed on a Web page. PTAB Missed Petitioner's Non-Factual Statements on Cited Art Are Contrary To Fact 38

B. SFCU 42

C. CORBA Interface Repository (IR) is NOT the '158 Virtual Information Store 55

D. CORBA a framework, Had NO POSvc Application Displayed on a Web page 56

E. CORBA Did Not Present Objects Or POSvc Applications On A Web Page. CORBA did Not Permit Communication between a CORBA object and a Web Page and/or Web Server in 1995-96 57

F. CORBA IIOP: IIOP used raw TCP/IP connections in order to transmit data. CORBA had no capability of communicating via HTTP; CORBA Program Objects Are Only The Back-End 57

G. '158 Patent Claims Are Not Anticipated Nor Rendered Obvious by CORBA, Individually or In Combination with Cited Art 58

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J. Claim 1:

a) "A method for performing a real time Web transaction from a Web application over a digital network atop the Web" 66

b). "providing a Web page for display on a computer system coupled to an input device" 68

c) "providing a point-of-service application as a selection within the Web page, wherein the point-of-service application provides access to both a checking and savings account, the point-of-service application operating in a service network atop the World Wide Web" 69

d) "accepting a first signal from the Web user input device to select the point-of-service application; accepting subsequent signals from the Web user input device" 72

e) "transferring funds from the checking account to the savings account in real-time utilizing a routed transactional data structure that is both complete and non-deferred, in addition to being specific to the point-of-service application, the routing occurring in response to the subsequent signals" 72

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I. Claim Construction

A distinguishing feature of the '158 Patent deriving priority from U.S. provisional application with S/N 60/006,634 filed November 13, 1995—is that the claimed real-time Web transaction *must* occur from a Web application that is a Web client and that is displayed in a Web browser. None of the known prior art offers this feature. In light of the PTAB Decision to Institute, Patent Owner respectfully suggests that the Board may have misunderstood some of the points of the invention. In light of the same, the Patent Owner seeks to clarify those perceived misunderstandings with slightly amended constructions from that provided in the Preliminary Response. The following terms construed together convey a clear and accurate understanding of how the claimed inventions differ from the prior art. In light of those differentiations and even in view of the simple claim language, claims 4-6 are not rendered obvious by the alleged cited art.

CLAIM TERM OR PHRASE	PATENT OWNER CONSTRUCTION	PTAB CONSTRUCTION
a) real-time Web transaction from a Web application; b) Web transaction is a loan requested from a	a non-deferred Web transaction (requested by a Web user) from an application that is a Web client displayed in a Web	"a software program that can be accessed by an Internet user." (Petitioner and PTAB construed only 'Web

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