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

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



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	A.	PO's alternative constructions are not supported by the specification and should not be adopted		
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		2.	"point-of service application as a selection within the Web page"	3
		3.	"facilities network"	4
		4.	"VAN service"	4
		5.	"service network"	5
		6.	"utilizing a routed transactional data structure"	5
		7.	"object routing"	6
		8.	"virtual information store"	7
	B. The Board's Decision on the Institution of Trial is final and non-appealable		8	
	C.	Claims 9 and 10 are non-statutory under 35 U.S.C. § 101		8
		1.	Claims 1, 9 and 10 are abstract and thus non-statutory	8
	D.	_	erly construed, claims 4-6 are unpatentable over the prior	9
		1.	Lawlor in view of Computerworld and further in view of CORBA1/CORBA2 renders claims 4-6 obvious.	10



	2.	Claims 1 and 4-6 are rendered obvious by SFCU in view of Electronic Banking and further in view of	
		CORBA1/CORBA2 or CORBA1/CORBA2 and SNMP15	
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TABLE OF AUTHORITIES

Cases

Accenture Global Servs. GmbH v. Guidewire Software, Inc., 728 F.3d 1336, 1345 (Fed. Cir. 2013)	
Alice Corp. v. CLS Bank Int'l, No. 13-298, 573 U.S (2014)	9
Dealertrack, Inc. v. Huber, 674 F.3d 1315, 1332-33 (Fed. Cir. 2012)	.9
Mayo Collaborative Servs. v. Prometheus Labs., Inc., 132 S. Ct. 1289, 1297 (201)	
Phillips v. AWH Corp., 415 F.3d 1303, 1316, 75 USPQ2d 1321, 1329 (Fed. Cir. 2005)	2



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, 4 th 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
SAP 1009	The Essential CORBA: Systems Integration Using Distributed Objects (CORBA1)
SAP 1010	Copyright registration webpage of CORBA1
SAP 1011	Protocol Operations For Version 2 Of The Simple Network Management Protocol
SAP 1012	The Common Object Request Broker: Architecture and Specification (CORBA2)
SAP 1013	Elnozahy et al., Experiences Using DCE and CORBA to Build



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