IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

INTELLECTUAL INTEGRITY, LLC, Petitioner

V.

APPLE INC, Patent Owner/Assignee. **CASE:** IPR2016-00500

PATENT: 7,864,163

PETITIONER'S MOTION TO CORRECT TYPOGRAPHICAL MISTAKE(S) UNDER 37 C.F.R. § 42.104(c)

Petitioner respectfully moves to correct several typographical mistakes in petition as originally filed on January 22, 2016. The corrections requested in the petition, and remarks pertinent to each, are as follows:

- At p.1, ¶2: replace "while the first box is enlarged, a second gesture is detected on a second box other than the first box; and in response to detecting the second gesture, the structured electronic document is translated so that the second box is substantially centered on the touch screen display" with

"while the first box is enlarged, detecting a second gesture on a second box other than the first box; and in response to detecting the second gesture, translated [sic] the structured electronic document so that the second box is substantially centered on the touch screen display."



Remarks: The requested correction is intended only to reflect the actual claim language resulting from the Certificate of Correction issued with U.S. Patent No. 7,864,163 ("the `163 Patent"). The changes made in the Certificate of Correction appear to be directed at merely changing the verb tense or voice. Petitioner avers that the correction of this typographical mistake in the petition does not affect or change the analysis or reasoning of the petition, nor does it alter the invalidity and/or unpatentability of the challenged claims;

- At p.17, ¶1: replace "recites 'while the first box is enlarged, a second gesture is detected on a second box other than the first box; and in response to detecting the second gesture, the structured electronic document is translated so that the second box is substantially centered on the touch screen display." with

"recites 'while the first box is enlarged, detecting a second gesture on a second box other than the first box; and in response to detecting the second gesture, translated [sic] the structured electronic document so that the second box is substantially centered on the touch screen display.";

and replace "should be read as 'while the first block is enlarged, a second touch interaction with the touch screen user interface is detected on a second block other than the first block; and in response to detecting the second touch interaction with the touch screen user interface, the browser compatible electronic document is translated so that the second block ..."

with



"should be read as 'while the first block is enlarged, detecting a second touch interaction with the touch screen user interface on a second block other than the first block; and in response to detecting the second touch interaction with the touch screen user interface, translating the browser compatible electronic document so that the second block ...'."

Remarks: Again, the requested correction is intended only to reflect the actual claim language resulting from the Certificate of Correction issued with the `163 Patent. The changes made in the Certificate of Correction appear to be directed at merely changing the verb tense or voice. Petitioner avers that the correction of this typographical mistake in the petition does not affect or change the analysis or reasoning of the petition, nor does it alter the invalidity and/or unpatentability of the challenged claims; and

- At p.22, ¶2: *replace*

"Ronald W. Burns

USPTO Reg. No. 44044

Intellectual Integrity, LLC

2591 Dallas Parkway, Suite 300

Frisco, Texas 75034

Phone: 972-632-9009

rwburns@intellectualintegrity.net"

with



"Ronald W. Burns

USPTO Reg. No. 44044

15139 Woodbluff Dr.

Frisco, Texas 75035

Phone: 972-632-9009

rwburns@intellectualintegrity.net"

Remarks: The requested correction is merely a correction of the registered attorney's correspondence address.

Petitioner respectfully submits that these mistakes were made without intent to mislead or unduly burden any party. Again, Petitioner avers that these corrections do not affect or change the analysis or reasoning of the petition, nor do they alter the invalidity and/or unpatentability of the challenged claims. Petitioner therefore respectfully submits that there is good cause for this motion, and respectfully requests that the corrections listed above be entered and/or made to the petition as originally filed.



Respectfully Submitted on behalf of Petitioner Intellectual Integrity, LLC,

By: /s/ Ronald W. Burns

Ronald W. Burns (Reg. No. 44,044)

15139 Woodbluff Dr.

Frisco, TX 75035

(972) 632-9009

rwburns@intellectualintegrity.net

