UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Unified Patents Inc.,

Petitioner

v.

Sentegra, LLC
Patent Owner

IPR2016-01109

Patent 8,706,627

PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 1, 4, 6, 7, 10-13, AND 16
OF U.S. PATENT NO. 8,706,627 UNDER 35 U.S.C. §§311-319

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I. INTRODUCTION

Pursuant to 35 U.S.C. §§ 311-319, Unified Patents Inc., ("Unified" or "Petitioner") petitions the PTAB to institute *inter partes* review of claims 1, 4, 6, 7, 10-13, and 16 of U.S. Patent No. 8,706,627 to Shore ("the '627 Patent," EX1001).

The challenged claims use many words to recite several simple and obvious concepts directed to a remote, handheld, ticket-purchasing system. Beyond these simple, obvious concepts, the claims are packed with long-known and conventional hardware limitations found in virtually every wireless, handheld device of the time, like "wireless communications hardware," "a data storage device," "a user input device," "a microprocessor," etc. Tellingly, the '627 Patent itself even admits that wireless, handheld devices, such as PDAs, were well known before the '627 patent's earliest priority date, Feb. 10, 2000. (EX1001, 25:13-14[1]; 8:45-48; 9:12-14). Thus, the only allegedly "inventive" aspect of the '627 Patent is its secure-purchase functionality, but that too was well known before 2000.

In fact, the claimed functionality amounts only to accessing a website, requesting an "authorization certificate" (or electronic ticket), exchanging payment and security information, downloading the certificate, and storing the certificate in memory. (EX1001, cl. 1; Figs. 12a-12d). All these steps were well known before 2000. (*See, e.g.*, EX1005, Fig. 5). Because the '627 Patent claims well-known

[1] For all exhibits, the citations refer to page number/column number:line numbers.

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functionality performed by an admittedly well-known wireless, handheld device, the challenged claims should be canceled as obvious.

II. MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(1), Petitioner provides the following mandatory disclosures:

A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that Unified is the real party-in-interest, and further certifies that no other party exercised control or could exercise control over Unified's participation in this proceeding, the filing of this petition, or the conduct of any ensuing trial. *See* EX1002.

B. The Patent Owner

The '627 Patent is assigned to Sentegra, LLC ("Sentegra").

C. Related Matters

The '627 Patent has been asserted in the following pending litigations, none of which involve Unified:

1. *Sentegra, LLC v. Asus Computer International*, No. 1:15-cv-03768 (S.D.N.Y. May 15, 2015);
2. *Sentegra, LLC v. Samsung Electronics America, Inc.*, No. 1:15-cv-09266 (S.D.N.Y. Nov. 24, 2015);

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