# UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD LINIELD DATENTS INC

UNIFIED PATENTS INC.,
Petitioner

V.

### INTELLECTUAL VENTURES II LLC Patent Owner

IPR2016-01404 Patent 6,968,459

### PATENT OWNER INTELLECTUAL VENTURES II LLC'S PRELIMINARY RESPONSE TO PETITION

Mail Stop PATENT BOARD Patent Trial and Appeal Board U.S. Patent & Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



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	В.		Petitioner did not establish a reasonable likelihood that Bensimon anticipates claims 1, 33, 39, 46, and 48		
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		2.	Petitioner did not show that Bensimon discloses the "restricte access mode" operation recited in claims 1, 33, and 39		
		3.	Petitioner did not show that Bensimon discloses "device- specific security information" as recited in claims 1, 33, and 3		
	C.	Petitioner did not establish a reasonable likelihood that Bensimon anticipates independent claims 13 and 14.		.17	
V.	Ground 2: The Board should deny institution because Petitioner did not establish a reasonable likelihood that the combination of Bensimon and Takahashi renders obvious claims 2, 15, and 34				
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	1	Petitioner did not show that the combination of Bensimon and Takahashi teaches or suggests "providing restricted-access." .22		
	2	Petitioner did not show that the combination of Bensimon and Takahashi teaches or suggests "encrypting digital data using the security information."		
	3	Petitioner did not show that the combination of Bensimon and Takahashi teaches or suggests "device-specific security information" as recited in claim 15		
VI.	Ground 3: The Board should deny institution because Petitioner did not establish a reasonable likelihood that the combination of Kimura and Takahashi renders obvious claim 18.			
	c	Petitioner did not establish a reasonable likelihood that the combination of Kimura and Takahashi teaches or suggests "sensing whether the storage device has security information."		
	c	Petitioner did not establish a reasonable likelihood that the ombination of Kimura and Takahashi teaches or suggests encrypting digital data using the security information."		
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### **Exhibit List**

Exhibit #	Description
2001	Microsoft Dictionary
2002	Schneier, B., Applied Cryptography, 2d. Ed., Wiley, 1996



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