

HCC INSURANCE HOLDINGS, INC.
Petitioner

V.

INTELLECTUAL VENTURES I LLC
Patent Owner

Case IPR2016-01431 Patent 7,949,752

PATENT OWNER PRELIMINARY RESPONSE

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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II.		752 patent enables efficient customization of technology-driven ces for individual users. The significant disadvantages of the prior art techniques for providing technological services.			
	В.	The '752 patent overcame the issues of the prior art by providing a network system extensible by user			
III.	Clai	n construction			
	B.	"exhausted" (Claims 1, 7, 9, 24).			
	C.	Means-plus-function elements.			
IV.	The Board should reject Petitioner's Grounds 1 and 2 because Petitioner has not met its burden of establishing a reasonable likelihood that the challenged claims are unpatentable				
	A.	Chow operates differently than the claimed invention of the '752 patent			
	В.	Petitioner has not established that Chow renders independent claims 1 7, 9, and 24 and their corresponding dependent claims obvious [Ground 1]			
		1. Petitioner fails to establish that Chow teaches or suggests the "invoking" elements of independent claims 1, 7, 9, and 24			
		2. Petitioner fails to meet its burden establishing that Chow teaches or suggests "wherein an amount of the service resource is exhausted upon being consumed by the network-based agent."			
	C.	Petitioner fails to establish that the combination of Chow and Baue renders claims 6.8 and 23 obvious [Ground 2]			



V.	beca	Board should reject Petitioner's Grounds 3 and 4 based on Goddard use Petitioner has not met its burden of establishing a reasonable ihood that the challenged claims are unpatentable	
	A.	Petitioner has not established that Goddard is a prior art printed publication	
	B.	Goddard provides simple execution of programs on remote hosts33	
	C.	Petitioner has not established that Goddard renders independent claims 1, 7, 9, and 24 and their corresponding dependent claims obvious [Ground 3]	
		1. Petitioner has not established that Goddard teaches or suggests the " <i>invoking</i> " elements of independent claims 1, 7, 9, and 2436	
		2. Petitioner did not meet its burden establishing that Goddard teaches or suggests "wherein an amount of the service resource is exhausted upon being consumed by the network-based agent."39	
		3. Petitioner did not meet its burden establishing that Goddard teaches or suggests an "event handler."	
	D.	Petitioner fails to establish that the combination of Goddard and Bauer renders claim 21 obvious [Ground 4]	
1 /I	Conclusion		



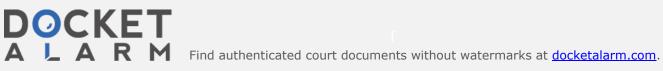
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Open Text S.A. v. Box, Inc., No. 13-CV-04910-JD, 2015 WL 4940798 (N.D. Cal. Aug. 19, 2015)	.32
SRI Int'l v. Internet Sec. Sys., 511 F.3d 1186 (Fed. Cir. 2008)	.32
Standard Innovation Corp. v. Lelo, Inc., IPR2014-00148, Final Written Decision, Paper 42 (PTAB Apr. 23, 2015)	.33
Stryker Corp. v. Karl Storz Endoscopy-America, Inc., IPR2015-00764. Paper 13 (P.T.A.B. Sept. 2, 2015)	40



EXHIBIT LIST

Exhibit No.	Description
2001	Intellectual Ventures I LLC v. HCC Insurance Holdings, Inc., Civil Action No. 6:15-CV-660-JRG, the Report and Recommendation of United States Magistrate Judge K. Nicole Mitchell
2002	Gourley, David et al., HTTP: The Definitive Guide (2002)
2003	Luotonen, Ari, "Web Proxy Servers" (1998)



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