

Filed on behalf of Unified Patents Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC.,
Petitioner

v.

PLANO ENCRYPTION TECHNOLOGIES, LLC,
Patent Owner

IPR2016-01644
U.S. Patent 6,466,983 B1

**SYSTEMS AND METHODS FOR CONTROLLING ACCESS
TO DATA MAINTAINED IN A REPOSITORY**

**PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 1-4, 6, 7, 9, and 10
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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A. Ground 1: Claim 1 is rendered obvious over *Shannon* (EX1006) in view of *He '451* (EX1003).....19

1. *Shannon* (EX1006)19
2. *He '451* (EX1003)21
3. Motivation to combine *He '451* (EX1003) and *Shannon* (EX1006)22
4. Chart for claim 1: *Shannon* in view of *He '451*. See Cohen Decl. (EX1002) at ¶ 46)28

B. Ground 2: Claims 2-4, 6, 7, 9, and 10 are rendered obvious by *Shannon* in view of *He '451*, further view of *Cragun*36

1. *Cragun*36
2. Motivation to combine *Cragun* with *He '451* and *Shannon*36
3. Chart for claims 2-4, 6, 7, 9, and 10: *Shannon* in view of *He '451*, further in view of *Cragun* (see Cohen Decl. (EX1002) at ¶ 57)40

VIII. Conclusion60

Exhibit List

Exhibit	Description
EX1001 ('983 patent)	U.S. Pat. No. 6,466,983 B1 ('983 patent)
EX1002 (Cohen decl.)	Declaration of Herbert Cohen (Cohen decl.)
EX1003 (<i>He '451</i>)	U.S. Pat. No. 6,088,451 (filed on Jun. 28, 1996; published on Jul. 11, 2000) (<i>He '451</i>).
EX1004 (<i>Cragun</i>)	U.S. Pat. No. 5,832,212 (filed on Apr. 19, 1996; published on Nov. 3, 1998) (<i>Cragun</i>)
EX1005 (<i>Blumenau</i>)	U.S. Pat. No. 7,756,986 B2 to Blumenau (<i>Blumenau</i>)
EX1006 (<i>Shannon</i>)	U.S. Pat. No. 6,233,618 (filed on Mar. 31, 1998; published on May 15, 2001) (<i>Shannon</i>)
EX1007 (<i>Gebauer</i>)	U.S. Pat. No. 7,062,489 B1 to Gebauer (<i>Gebauer</i>)
EX1008 (<i>Papierniak</i>)	U.S. Pat. No. 6,714,931 (filed on Apr. 29, 1998; published on Mar. 30, 2004) (<i>Papierniak</i>)
EX1009 (<i>Gitner</i>)	U.S. Pat. No. 5,982,891 to Gitner (<i>Gitner</i>)
EX1010 (File History)	U.S. Pat. No. 6,466,983 B1 File History
EX1011	Unified Patents Inc.'s Voluntary Interrogatories
EX1012	Excerpt of HTML 4.0 Specification (1997)

I. MANDATORY NOTICES

A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Unified Patents Inc. (“Unified” or “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. In this regard, Unified has submitted voluntary discovery. *See* EX1011 (Unified Patents Inc.’s Voluntary Interrogatories).

B. Related Matters

U.S. Pat. No. 6,466,983 (“983 patent” (EX1001)) is owned by Plano Encryption Technologies, LLC (“Plano” or “Patent Owner”) according to the assignment records of the United States Patent and Trademark Office.

C. Counsel

P. Andrew Riley will act as lead counsel; Jonathan Stroud and James Stein will act as backup counsel.

D. Service Information, Email, Hand Delivery, and Postal

Petitioner consents to electronic service, and request patent owners do the same. Petitioner can be served at Plano983IPR@finnegan.com and jonathan@unifiedpatents.com. P. Andrew Riley and James D. Stein can be reached at Finnegan, Henderson, Farabow, Garrett & Dunner, L.L.P., 901 New York

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