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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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GOOGLE INC.  
Petitioner

v.

IXI IP, LLC  
Patent Owner

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Case No. IPR2016-01669  
Patent 7,552,124

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**PATENT OWNER'S OPPOSITION TO MOTION TO TERMINATE OR  
STAY CO-PENDING REEXAMINATION**

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**PATENT OWNER'S TABLE OF EXHIBITS**

**Previously filed**

<b>Exhibit No.</b>	<b>Exhibit Description</b>
2001	Declaration of Lin Chase, Ph.D.
2002	“Keyword spotting,” downloaded from <i>Wikipedia: The Free Encyclopedia</i> , <a href="https://en.wikipedia.org/wiki/Keyword_spotting">https://en.wikipedia.org/wiki/Keyword_spotting</a> (June 29, 2017).
2003	U.S. Patent No. 8,433,611 of Lax <i>et al.</i> , assigned to Google Inc.

Pursuant to the Board's authorization during a teleconference on August 21, 2017, Patent Owner ("IXI") hereby submits this Opposition to Petitioner's Motion to Terminate or Stay Co-Pending Reexamination (Paper 15, "Motion"). The Motion should be denied as Petitioner has failed to demonstrate that it is entitled to the requested relief to terminate or stay the *ex parte* reexamination of U.S. Patent 7,552,124 (Control No. 90/013,988, "the '124 Patent Reexam").

**I. THE BOARD SHOULD NOT STAY OR TERMINATE THE '124 PATENT REEXAM**

In response to Petitioner's request to institute *inter partes* review of claims 1-10 of the '124 Patent, the Institution Decision dated March 8, 2017 instituted review of claims 1-5 on the various asserted grounds and denied review of claims 6-10 finding that "Petitioner fails to demonstrate a reasonable likelihood of prevailing in its challenge to claims 6-10...." Paper 9 at 9. On July 17, 2017, IXI filed a request for *ex parte* reexam as to non-instituted claims 6-10 of the '124 Patent, and submitted therewith two new independent claims 11 and 12 that differ from any of the claims 1-10 as originally issued.

Petitioner concedes that the Board *declined* to institute on the claims that served as the basis for the '124 Patent Reexam, that the CRU ordered reexam on the basis of SNQPs in light of art that is *not* at issue in the present proceeding, and that PO presented new claims in the request. Motion at 1-2. Petitioner nonetheless requests that IXI be prevented from expeditiously pursuing reexam of the claims

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