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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE INC.
Petitioner

v.

IXI IP, LLC
Patent Owner

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

PATENT OWNER'S PRELIMINARY RESPONSE PURSUANT TO 37 C.F.R. § 42.107

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1. *Pazandak* fails to disclose "receiving a high-level code comprising one or more keywords, wherein the high-level code is provided by a user … without having to select from menu items …" as alleged by Petitioner. 29

2. *Pazandak* fails to disclose "parsing the high-level code for the keywords" as alleged by Petitioner. 32

3. *Pazandak* fails to disclose "determining whether high-level code comprises keywords defining one or more relationships and conditions corresponding to the operative language" as alleged by Petitioner. 34

4. *White* fails to disclose "determining level of complexity and implementation of the high-level code" as alleged by Petitioner. 35

5. A person of ordinary skill in the art would not have combined *Pazandak*, *White*, and *Manson* as alleged by Petitioner. 37

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