UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NETAPP, INC., LENOVO (UNITED STATES) INC., and EMC CORP., Petitioners

v.

INTELLECTUAL VENTURES II LLC Patent Owner

IPR2017-00467 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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	C.	Petitioners have not established a reasonable likelihood that the combination of Blakley and Bramhill renders independent claim 15 obvious		
		1. Petitioners have not established a reasonable likelihood of showing that the combination discloses the "sensing" element of claim 15		
		2. Petitioners have not established a reasonable likelihood of showing that the combination discloses "providing restricted-access to the storage device" as recited in claim 15		
	D.	Petitioners have not established a reasonable likelihood that the combination of Blakley and Bramhill renders claims 18, 24, and 25 obvious		
VI.	estab	nd 2: The Board should deny institution because Petitioners have not ished a reasonable likelihood that the combination of Uchida and hill renders claims 15, 18, 24, and 25 obvious28		



	A.	Petitioners have not established a reasonable likelihood that the combination of Uchida and Bramhill renders independent claim 15 obvious.	.28
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