UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC., Petitioner

v.

INTELLECTUAL VENTURES II LLC Patent Owner

> IPR2016-01404 Patent 6,968,459

PATENT OWNER INTELLECTUAL VENTURES II LLC'S PRELIMINARY RESPONSE TO PETITION

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	A.	Over	view of Bensimon7	
	B.		oner did not establish a reasonable likelihood that Bensimon pates claims 1, 33, 39, 46, and 48	
		1.	Overview of the differences between Bensimon and claims 1, 33, and 399	
		2.	Petitioner did not show that Bensimon discloses the " <i>restricted-access mode</i> " operation recited in claims 1, 33, and 3910	
		3.	Petitioner did not show that Bensimon discloses " <i>device-specific security information</i> " as recited in claims 1, 33, and 39	
	C.		oner did not establish a reasonable likelihood that Bensimon pates independent claims 13 and 1417	
V.	estab	lish a r	The Board should deny institution because Petitioner did not reasonable likelihood that the combination of Bensimon and enders obvious claims 2, 15, and 34	
	A.		oner did not establish a reasonable likelihood that Bensimon and hashi renders obvious claim 2	
	B.		oner did not establish a reasonable likelihood that Bensimon and hashi renders obvious independent claim 15	

		1.	Petitioner did not show that the combination of Bensimon an Takahashi teaches or suggests " <i>providing restricted-access</i> ."	
		2.	Petitioner did not show that the combination of Bensimon an Takahashi teaches or suggests " <i>encrypting digital data using</i> <i>the security information</i> ."	5
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<u>Exhibit List</u>

Exhibit #	Description
2001	Microsoft Dictionary
2002	Schneier, B., Applied Cryptography, 2d. Ed., Wiley, 1996

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