

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SECURUS TECHNOLOGIES, INC.
Petitioner

v.

GLOBAL TEL*LINK CORPORATION
Patent Owner

Case IPR2017-00758
Patent 8,515,031

PATENT OWNER PRELIMINARY RESPONSE

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I. Introduction

The Board should not institute *Inter Partes* Review (“IPR”) of claims 1-20 of U.S. Patent No. 8,515,031 (Exhibit 1001) (“’031 patent”). Four independent grounds for denying the Petition exist. Additionally, separate grounds exist for denying institution of IPR review of dependent claims 2, 4-6, 8, 10, 12, 14-16, 18, and 20.¹

First, the Board should deny the Petition because Petitioner fails to consider the claims of the ‘031 patent as a whole. A determination of obviousness is made with respect to the claims as a whole, not piecemeal as Petitioner has done. In particular, claims 1 and 11 include temporal limitations that must be considered together and in a particular sequence. Petitioner fails to conduct this analysis, and therefore the Petition should be denied.

Second, the Board should deny the Petition because Petitioner fails to establish a reasonable likelihood that Falcone (Exhibit 1004) in view of Hodge (Exhibit 1005) discloses the “*verifying*” elements of independent claims 1 and 11.

¹ Grounds for denying institution of claims 5, 6, and 10 exist based on their dependency on claim 4, which Petitioner has failed to show a reasonable likelihood exists that the claim is obvious. Grounds for denying institution of claims 15, 16, and 20 exist based on their dependency on claim 14, which Petitioner has failed to show a reasonable likelihood exists that the claim is obvious.

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