UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TELESIGN CORPORATION
Petitioner

v.

TWILIO, INC.
Patent Owner

Patent 8,755,376
IPR Case Number: IPR2017-01977

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,755,376

TABLE OF CONTENTS

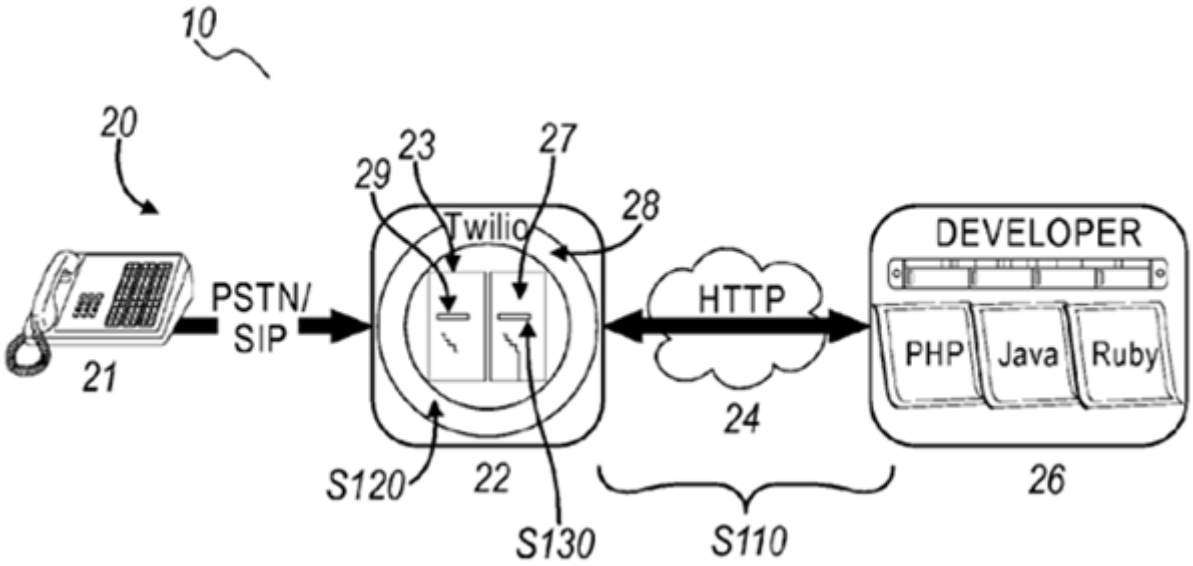
I. INTRODUCTION

Petitioner TeleSign Corporation requests *Inter Partes* Review ("IPR") of claims 1-3, 5, 14, 16-17, and 19 ("the Challenged Claims") of U.S. Patent No. 8,755,376 ("the '376 Patent"). The '376 Patent is allegedly directed to a method and system that allows for the creation of telephony-based applications without requiring expertise in complicated telephony-network interfacing. The claims, however, are broadly directed to the exchange of messages between an application seeking to invoke functionality on a telephony network, such as setting up a phone call or collecting DTMF digits, and a gateway connected to that telephony network for converting the request into telephony action. Indeed, the claims are not directed to *how* the gateway converts an application's request into telephony action. Instead, the claims are merely directed to a request-response message exchange pattern using web-service-messaging formats that the '376 Patent concedes were well known in the art to invoke telephony-network functionality. By April 2008, however, gateways for converting a request for telephony functionality into telephony-network action were well known. As demonstrated below, this prior art allowed an application through a request-response message exchange pattern with a system connected to a telephony-network, to invoke telephony-network functionality, such as a setting up a call or collecting DTMF digits from a caller.

II. SUMMARY OF THE '376 PATENT

A. DESCRIPTION OF THE ALLEGED INVENTION OF THE '376 PATENT

The '376 Patent describes a method for processing a telephony session involving a call router (22) connected both to a telephony network, such as the public switched telephone network ("PSTN") (21), and to an application server (26) via the Internet (24):



EX1001 at Abstract; FIG. 2A.

The method, illustrated in the annotated Figure 2A above, includes the following steps. The call router accepts an incoming message, such as a phone call from a telephony network, and communicates with an application server to receive an application response. *Id.* at 3:14-4:31. The call router then converts the response into telephony action on the telephony network (S120), such that, for

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.