

Case IPR2017-01977
Patent 8,755,376

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

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I.	Introduction.....	1
II.	Maes and ransom render the '376 Patent obvious.....	2
	A. Ransom is analogous art.....	2
	B. Skilled artisans would have been motivated to combine Maes with Ransom.	3
	C. Claim 1 is rendered obvious in view of Maes and Ransom.....	6
	1. Maes teaches “a plurality of API resources.”	6
	2. Petitioner relies on the same resources for the operating and exposing limitations	7
	3. Ransom teaches REST API.	7
	4. Ransom does not teach away from REST.	10
	D. Maes and Ransom teach “receiving a REST API request that specifies an API resource URI.”	10
	E. Maes and Ransom teach “responding to the API request according to the request and the specified resource URI.”	11
	F. Maes and Ransom render the dependent claims obvious.	15
III.	ETSI and ransom render the '376 Patent obvious	17
	A. ETSI and Ransom teach “plurality of API resources,”	17
	B. ETSI and Ransom teach “exposing the plurality of API resources through a REST API.”	17
	C. Skilled artisans would be motivated to combine ETSI with Ransom.	18
	D. ETSI and Ransom teach the <i>receiving</i> limitation.....	19
	E. ETSI and Ransom teach the <i>responding</i> limitation	19
	F. ETSI and Ransom render the dependent claims obvious.....	20

IV.	None of the secondary considerations evidence Patent owner advances is probative of nonobviousness	22
A.	Patent Owner does not adequately show that its products embody the '376 Patent.....	22
B.	Patent Owner fails to show that Petitioner copied its patented technology.	24
C.	Patent Owner's commercial-success evidence is deficient.....	27
D.	Patent Owner fails to show a long-felt, unmet need.	28
E.	Patent Owner fails does not properly show industry praise.....	29
V.	Conclusion	29

EXHIBIT LIST

Exhibit Number	Document
EX1001	U.S. Patent 8,755,376 to Lawson, et al. (<i>'376 Patent</i>)
EX1002	File History of U.S. Patent 8,755,376 to Lawson, et al. (<i>'376 Patent File History</i>) Part 1 – pages 1-220 Part 2 – pages 221-440 Part 3 – pages 441-660 Part 4 – pages 661-880 Part 5 – pages 881-1102
EX1003	U.S. Patent 6,801,604 to Maes, et al. (<i>Maes</i>)
EX1004	U.S. Patent Publication 2003/0204756 to Ransom, et al. (<i>Ransom</i>)
EX1005	U.S. Patent 7,092,370 to Jiang, et al. (<i>Jiang</i>)
EX1006	ETSI ES 202 391-4 V1.2.1 (2006-12), “Open Service Access (OSA); Parlay X Web Services; Part 4: Short Messaging (Parlay X 2) (<i>ETSI ES 202 391-4</i>)
EX1007	ETSI ES 202 391-7 V1.2.1 (2006-12), “Open Service Access (OSA); Parlay X Web Services; Part 7: Account Management (Parlay X 2) (<i>ETSI ES 202 391-7</i>)
EX1008	ETSI ES 202 391-2 V1.2.1 (2006-12), “Open Service Access (OSA); Parlay X Web Services; Part 2: Third Party Call (Parlay X 2) (<i>ETSI ES 202 391-2</i>)
EX1009	Declaration of Dr. Seth Nielson (<i>Nielson Decl.</i>)
EX1010	Twilio’s Opening Claim Construction Brief
EX1011	“Giving SOAP a REST,” DevX.com, by Amit Asaravala, 2002, available at

	https://web.archive.org/web/20021202002704/www.devx.com/DevX/Article/8155
EX1012	W3C Working Draft, "Web Services Description Requirements", October 28, 2002, available at http://www.w3.org/TR/2002/WD-ws-desc-reqs-20021028
EX1013	"REST vs. SOAP Web Services," August 3, 2005, available at https://web.archive.org/web/20051018025732/https://www.petefreitag.com/item/431.cfm
EX1014	U.S. Pub. App. 2008/0140861 to Kothari, et al. (<i>Kothari</i>)
EX1015	W3C Working Draft, "SOAP Version 1.2," July 9, 2001
EX1016	Authentication Declaration of TeleSign Employee Marciano Reconnu
EX1017	Feb. 28, 2010, 6:14 PM email re "Twilio Account Activity"
EX1018	Feb. 28 2010, 5:55 PM email re "Twilio Account Activity"
EX1019	Supplemental Declaration of Seth Nielson, Ph.D.
EX1020	Declaration of Patent Owner's District-Court Claim-Construction Expert: Dr. Kevin Almeroth.

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.