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

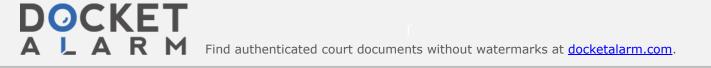


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I. Introduction		duction1
II.	Maes	and ransom render the '376 Patent obvious
	А.	Ransom is analogous art
	В.	Skilled artisans would have been motivated to combine Maes with Ransom
	C.	Claim 1 is rendered obvious in view of Maes and Ransom
		1. Maes teaches "a plurality of API resources."
		2. Petitioner relies on the same resources for the operating and exposing limitations
		3. Ransom teaches REST API
		4. Ransom does not teach away from REST
	D.	Maes and Ransom teach "receiving a REST API request that specifies an API resource URI."
	E.	Maes and Ransom teach "responding to the API request according to the request and the specified resource URI."
	F.	Maes and Ransom render the dependent claims obvious
III.	ETSI	and ransom render the '376 Patent obvious
	А.	ETSI and Ransom teach "plurality of API resources," 17
	В.	ETSI and Ransom teach "exposing the plurality of API resources through a REST API."
	C.	Skilled artisans would be motivated to combine ETSI with Ransom.18
	D.	ETSI and Ransom teach the <i>receiving</i> limitation
	E.	ETSI and Ransom teach the <i>responding</i> limitation 19
	F.	ETSI and Ransom render the dependent claims obvious

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

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EXHIBIT LIST

Exhibit Number	Document
EX1001	U.S. Patent 8,755,376 to Lawson, et al. ('376 Patent)
EX1002	File History of U.S. Patent 8,755,376 to Lawson, et al. ('376 Patent File History)
	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. (Ransom)
EX1005	U.S. Patent 7,092,370 to Jiang, et al. (Jiang)
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</i> 202 391-4)
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</i> 202 391-2)
EX1009	Declaration of Dr. Seth Nielson (Nielson Decl.)
EX1010	Twilio's Opening Claim Construction Brief
EX1011	"Giving SOAP a REST," DevX.com, by Amit Asaravala, 2002, available at

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	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 <u>http://www.w3.org/TR/2002/WD-ws-desc-reqs-20021028</u>
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. (Kothari)
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.

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