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Filed on behalf of Mastercard International Incorporated

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Mastercard International Incorporated,
Petitioner

v.

WILLIAM GRECIA,
Patent Owner

IPR 2017-00788

U.S. Patent No. 8,402,555

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 8,402,555
CHALLENGING CLAIMS 1-26
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 8,402,555 to Grecia
1002	<i>Grecia v. Amazon.com</i> , No. 2:14-cv-00530 (W.D. Wash. Dec. 22, 2014) (Joint claim construction statement by Patent Owner and Amazon) with Ex. C
1003	US Pub. No. 2006/0212401 to Ameerally, <i>et al.</i> , Sep. 21, 2006
1004	US Pub. No. 2007/0233606 to Zweig, <i>et al.</i> , Oct. 4, 2007
1005	US Pub. No. 2005/0021478 to Gautier <i>et al.</i> , Jan. 27, 2005
1006	<i>First Look: iTunes Digital Copy</i> , Dan Frakes, MacWorld, Jan. 22, 2008
1007	<i>Security Engineering: A Guide to Building Dependable Distributed Systems</i> , 2 nd Ed., Ross Anderson (2008), “Chapter 6: Distributed Systems” and “Chapter 22: Copyright and DRM”
1008	<i>How Do I Use a Starbucks iTunes Free Pick of the Week Song Card</i> , Dave Taylor, Aug. 8, 2008
1009	<i>Brick-and-Mortar Stores Eye New Music Formats</i> , Ed Christman, Reuters Internet News, October 28, 2007
1010	US Pub. No. 2004/0254883 to Kondrk <i>et al.</i> , Dec.16, 2004
1011	US Pub. No. 2008/0040379 to Suitts <i>et al.</i> , Feb. 14, 2008
1012	<i>iTunes Store Terms of Service</i> , Apple Inc., September 10, 2007
1013	Declaration of Ravi S. Cherukuri & Exhibits A-C

I. MANDATORY NOTICES

A. Real Party-in-Interest

Pursuant to 37 C.F.R. § 42.8(b)(1), Petitioner certifies that: (1) Mastercard International Incorporated (“Mastercard”) is the real party-in-interest, which is a subsidiary of Mastercard Incorporated; and (2) no other party exercised control, or could exercise control, over Mastercard’s participation in this proceeding, the filing of this petition, or the conduct of any ensuing trial.

B. Related Matters

U.S. Patent No. 8,402,555 (‘555 Patent (EX1001)) is a parent of continuation U.S. Patent No. 8,533,860 (‘860 Patent), which is a parent of continuation U.S. Patent No. 8,887,308 (‘308 Patent).

Since November 18, 2015, the owner of the ‘555 Patent, William Grecia (“Grecia”), has filed patent infringement lawsuits against the following parties asserting infringement of certain claims of the ‘555 Patent: (a) Big Ten Network Services, LLC; (b) Cablevision Systems Corporation; (c) Fox Entertainment Group, Inc.; (d) NFL Network Services, LLC; (e) Starz Entertainment, LLC; (f) Adobe Systems Incorporated; (g) Adorama Camera, Inc.; (h) Cox Communications, Inc., (i) McDonald’s Corporation; (j) Mastercard Incorporated; (k) American Express Company; and (l) Visa Incorporated.

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