Case IPR2019-01113 Patent 6,034,621 Attorney Docket No. 170317-017USIPR

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

UNIFIED PATENTS INC Petitioner

v.

SOUND VIEW INNOVATIONS, LLC Patent Owner

> Case IPR2019-01113 Patent 6,034,621

PATENT OWNER SOUND VIEW INNOVATIONS, LLC'S PRELIMINARY RESPONSE TO UNIFIED PATENTS INC'S PETITION FOR *INTER PARTES* REVIEW OF UNITED STATES PATENT NO. 6,034,621

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V.	THE PETITON FAILS TO DEMONSTRATE THAT CLARK IN VIEW OF CASHMAN RENDER THE CHALLENGED CLAIMS OBVIOUS (ALL CHALLENGED CLAIMS, GROUND 1)					
	A.		And Cashman Do Not Teach "Monitoring A Change To Said File Automatically Without User Intervention."	0		
	B.	Syncl	And Cashman Do Not Teach "Transmitting Said hronization Data Packet Over Said Wireless Telephonic ork Automatically Without User Intervention."1	8		
	C.	C. Clark In View Of Cashman Do Not Teach "Monitoring A Change To Said Data File," "Assembl[ing] A Synchronization Information Data Packet Including Information Regarding Said Detected Change" And Then "Transmitting Said Synchronization Information Packet" "Over [A] Wireless Telephonic Network."21				
VI.	FOL	PETIT ADAR	CON FAILS TO DEMONSTRATE THAT FALLS IN VIEW OF E RENDERS THE CHALLENGED CLAIMS OBVIOUS (ALI GED CLAIMS, GROUND 2)2	F		
	A.		And Foladare Do Not Teach "After Detection Of Said Change aid Data File Triggering A Synchronization Routine."	30		
		1.	The Petition fails to specify where "after detection of said change to said data file triggering a synchronization routine" is allegedly found in the asserted references	80		
		2.	The portions of Falls cited in the Petition fail to teach "after detection of said change to said data file triggering a synchronization routine."	}4		

	В.	Falls And Foladare Do Not Teach "Synchroniz[ing] A Data FileAutomatically Without User Intervention."			
		1.	The Petition fails to demonstrate that Falls teaches "monitoring," "triggering," and "transmitting" steps that "are all performed automatically without user intervention." 37		
		2.	Falls plainly states that its synchronization routine is not automatic and does require user intervention		
		3.	Falls discloses no "triggering" "after detection of said change to said data file" that is performed "automatically."		
		4.	Falls' synchronization requires user intervention such as reconnecting to a network and selecting data to be copied prior to disconnection from the network		
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EXHIBIT LIST				
2001	Disclaimer in Patent Under 37 CFR 1.321(a), U.S. Pat. No. 6,034,621, cls. 1-8, 15-18, 21-38, and 40-44 (08/972,453 Sept. 4, 2019)			
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