

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HCC INSURANCE HOLDINGS, INC.
Petitioner

v.

INTELLECTUAL VENTURES I LLC
Patent Owner

Case IPR2016-01431
Patent 7,949,752

PATENT OWNER PRELIMINARY RESPONSE

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Patent Trial and Appeal Board
U.S. Patent & Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

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C. Petitioner has not established that Goddard renders independent claims 1, 7, 9, and 24 and their corresponding dependent claims obvious [Ground 3].36

1. Petitioner has not established that Goddard teaches or suggests the “*invoking*” elements of independent claims 1, 7, 9, and 24.36

2. Petitioner did not meet its burden establishing that Goddard teaches or suggests “*wherein an amount of the service resource is exhausted upon being consumed by the network-based agent.*”39

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EXHIBIT LIST

Exhibit No.	Description
2001	<i>Intellectual Ventures I LLC v. HCC Insurance Holdings, Inc.</i> , Civil Action No. 6:15-CV-660-JRG, the Report and Recommendation of United States Magistrate Judge K. Nicole Mitchell
2002	Gourley, David <i>et al.</i> , HTTP: The Definitive Guide (2002)
2003	Luotonen, Ari, “Web Proxy Servers” (1998)

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