

UNITED STATES PATENT AND TRADEMARK
OFFICE

Before the Patent Trial and Appeal Board

DISH NETWORK L.L.C., Petitioner,

v.

William Grecia, Patent Owner.

U.S. Patent No. 8,887,308
Filing Date: May 6, 2013
Issue Date: November 11, 2014
Title: Digital Cloud Access —PDMAS Part III

Preliminary Response by Patent Owner William Grecia

Table of Contents

INTRODUCTION..... 1

BACKGROUND..... 1

The '308 Patent 2

Tiu 12

Fetterman 16

ARGUMENT 17

Claim Construction 17

I. The Board should decline to institute *inter partes* review because neither Tiu nor Fetterman teach or suggest transforming a user access request for cloud digital content into a computer readable authorization object. 23

 A. “Receiving an access request for cloud digital content through an apparatus . . . the access request being a write request to a data store . . . the access request further comprises verification data provided by at least one user, wherein the verification data is recognized by the apparatus as a verification token” 24

B. “Authenticating the verification of (a) using a database recognized by the apparatus of (a) as a verification token database.”

26

C. “Wherein establishing the API communication requires a credential assigned to the apparatus of (a)” 28

D. “Requesting . . . from the apparatus of (a) . . . the at least one verified web service identifier” 29

E. “Receiving the query data requested in (d) from the API communication data exchange session of (c).” 29

F. “Creating a computer readable authorization object by writing into the data store of (a) at least one of: the received verification data of (a); and the received query data of (e)” 30

CONCLUSION..... 30

Exhibit List

Exhibit No.	Description
2001	2014-09-19 Notice of Allowance and Fees Due (PTOL-37)
2002	U.S. Pub. No. 2011/0288946 to Baiya <i>et al.</i>
2003	U.S. 7,526,650 to Wimmer

INTRODUCTION

William Grecia is the owner and inventor of U.S. Patent No. 8,887,308 (hereinafter, the “‘308 patent”). The Examiner allowed the ‘308 patent claim over two references that, while teaching some steps of the ‘308 claim, did not “establish[] an API communication between the apparatus of (a) and a database apparatus” (Ex. 2001 (Reasons for Allowance).) The prior art references did not use an API “related to a verified web service” (*Id.*) They did not use this API connection “to complete the verification process, wherein the data exchange session . . . comprises at least one verified web service account identifier” (*Id.*)

The Board should decline to institute *inter partes* review here because the references DISH Network L.L.C (“DISH”) asserts against the ‘308 patent claim lack not only an API connection between the apparatus of (a) and a verified web service (as found by the Examiner), but these references also neither teach nor suggest a verification token or account identifier that is transformed into a computer readable authorization object.

BACKGROUND

In this section, Patent Owner describes the ‘308 patent and the Examiner’s reason for allowance. This section also sets forth the

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