

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SONY INTERACTIVE ENTERTAINMENT LLC,
Petitioner,

v.

BOT M8, LLC,
Patent Owner.

Case IPR2020-01218
U.S. Patent No. 8,095,990

PATENT OWNER'S PRELIMINARY RESPONSE

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Sony Interactive Entertainment LLC (“Sony” or “Petitioner”) submitted a Petition to institute *inter partes* review of Bot M8, LLC’s (“Bot M8” or “Patent Owner”) U.S. Patent No. 8,095,990 (EX. 1001, “the ’990 Patent”), challenging claims 1–10 (“the Challenged Claims”). The Board should deny institution of the *inter partes* review under 35 U.S.C. § 325(d) because Petitioner has not demonstrated a reasonable likelihood that any Challenged Claim is unpatentable. None of the proposed references include the mutual authentication limitation recited in all of the Challenged Claims.

I. INTRODUCTION

The Challenged Claims of the ’990 Patent cover a novel security technique for improving gaming machines. Recognizing that software located on gaming machines and removable media devices, such as CDs, DVDs, and USB drives, can be corrupted or replaced with malicious content, the ’990 Patent claims a system for performing bi-directional authentication between two authentication programs: (1) an authentication program located on the gaming machine for authenticating a mutual authentication program, and (2) the mutual authentication program located within gaming data on a removable media device for checking that the authentication program is legitimate. Using this bi-directional authentication technique, the ’990 Patent ensures that neither the gaming system nor the removable media device can be compromised.

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