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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ELASTIC N.V.,
Petitioner,

v.

GUADA TECHNOLOGIES LLC,
Patent Owner.

Case No. IPR2021-00875
Patent No. 7,231,379

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,231,379**

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I. INTRODUCTION

Petitioner Elastic N.V. (“Elastic” or “Petitioner”) respectfully requests *inter partes* review of claims 1-7 of U.S. Patent 7,231,379 (“the ’379 patent”).

The ’379 patent is directed to keywords for searching a hierarchical network. The keywords correspond to points on that network, called “nodes” or “vertices.” The claims involve two obvious concepts.

First, when a user inputs a keyword, the system “jumps” the user to the node or vertex for that keyword, without requiring the user to traverse intervening points. The ’379 patent was allowed largely on this “jumping.” However, as shown in the prior art references Wesemann and Fratkina, “jumping” was well-known by 2002. *See* EX1004 Abstract; EX1007 ¶¶36-40, 49, 55-56, 84. Neither reference was cited during prosecution.

Second, the ’379 patent includes four claims related to using and updating a thesaurus for synonyms to user inputs. However, these thesaurus steps had already been developed by the 1990s. EX1007 ¶¶41-45, 69-76.

“Jumping” was not novel, and the ’379 patent did not improve on “jumping” in a non-obvious way. EX1007 ¶¶31-93. Accordingly, Elastic respectfully requests that the Board institute *inter partes* review and cancel the challenged claims.

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