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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC.,
Petitioner,

v.

VIRTAMOVE, CORP.,
Patent Owner.

IPR2025-00566
U.S. Patent No. 7,519,814

**PETITION FOR *INTER PARTES* REVIEW
OF CLAIMS 3, 5, 7, 11-12, 15-16, AND 31-34
OF U.S. PATENT NO. 7,519,814**

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A.	Ground 1: Claims 3, 5, 7, 11-12, 15, and 31-34 are Unpatentable as Obvious in View of Osman-----	20
1.	Claim 3 -----	20
a.	Limitation 1[pre][i]: “In a system having a plurality of servers” -----	20
b.	Limitation 1[pre][ii]: “with operating systems that differ”-----	20
c.	Limitation 1[pre][iii]: “operating in disparate computing environments” -----	21
d.	Limitation 1[pre][iv]: “wherein each server includes a processor and an operating system including a kernel” -----	22
e.	Limitation 1[pre][v]: “a set of associated local system files compatible with the processor” -----	22
f.	Limitation 1[pre][vi]: “a method of providing at least some of the servers in the system with secure, executable applications related to a service” -----	23
g.	Limitation 1[pre][vii]: “wherein the applications are executed in a secure environment”-----	23
h.	Limitation 1[pre][viii]: “wherein the applications each include an object	

	executable by at least some of the different operating systems for performing a task related to the service” -----	24
i.	Limitation 1[a][i] “the method comprising: storing in memory accessible to at least some of the servers a plurality of secure containers of application software” -----	24
j.	Limitation 1[a][ii]: “each container comprising one or more of the executable applications and a set of associated system files required to execute the one or more applications” -----	26
k.	Limitation 1[a][iii]: “for use with a local kernel residing permanently on one of the servers” -----	27
l.	Limitation 1[a][iv]: “wherein the set of associated system files are compatible with a local kernel of at least some of the plurality of different operating systems” -----	27
m.	Limitation 1[a][v]: “the containers of application software excluding a kernel” -----	28
n.	Limitation 1[a][vi]: “wherein some or all of the associated system files within a container stored in memory are utilized in place of the associated local system files that remain resident on the server” -----	28
o.	Limitation 1[a][vii]: “wherein said associated system files utilized in place of the associated local system files are copies or modified copies of the associated local system files that remain resident on the server” -----	29

p.	Limitation 1[a][viii]: “wherein the application software cannot be shared between the plurality of secure containers of application software” -----	29
q.	Limitation 1[a][ix]: “wherein each of the containers has a unique root file system that is different from an operating system’s root file system”-----	30
r.	Limitation 2: “wherein each container has an execution file associated therewith for starting the one or more applications” -----	30
s.	Limitation 3: “wherein the execution file includes instructions related to an order in which executable applications within will be executed” -----	30
2.	Claim 5 -----	31
3.	Claim 7 -----	31
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5.	Claim 12-----	33
6.	Claim 15-----	33
a.	Limitation 14[a][i]: “creating containers prior to said step of storing containers in memory, wherein containers are created by:” ---	33
b.	Limitation 14[a][ii]: “a) running an instance of a service on a server” -----	34
c.	Limitation 14[a][iii]: “b) determining which files are being used” -----	34

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