

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUPERCELL OY,
Petitioner

v.

GREE, INC.,
Patent Owner

Case: PGR2018-00029
U.S. Patent No. 9,636,583

PATENT OWNER'S RESPONSE

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Patent Owner's Exhibit List

Exhibit No.	Exhibit Description
2001	April 26, 2018 "Guidance on the impact of SAS on AIA trial proceedings," <i>available at</i> https://www.uspto.gov/patents-application-process/patent-trial-and-appeal-board/trials/guidance-impact-sas-aia-trial
2002	Declaration of David Crane
2003	JP2007252696 and Machine Translation of Description
2004	Biography of Steven D. Moore

I. Introduction.

The challenged claims of the '583 patent are patentable. The claims are not directed to an abstract idea, and also recite an inventive concept sufficient to satisfy *Alice* step two. The claims are also supported and definite. Further, it is Petitioner's burden to prove otherwise, and Petitioner has failed to do so.

First, the challenged claims are not directed to an abstract idea. The '583 patent identifies a specific problem in the video game art—the failure of a particular type of video game interface to keep the interest and attention of the user. The '583 patent discloses and claims a solution to this problem in the form of a technological improvement to graphical user-interfaces through the use of the specifically claimed panels—a graphical user-interface element with visual features and a corresponding data structure that was previously unknown in the art. The challenged claims recite specific and concrete limitations as to how these panels are stored, selected, disposed, and displayed, and the corresponding graphical user-interface elements for doing so. The Federal Circuit has consistently found such claims patentable. Petitioner generalizes the claims to such a degree that explicitly recited limitations are essentially absent from the analysis. And Petitioner provides almost no evidentiary support for its arguments.

Second, with respect to *Alice* step two, the mere fact that the claims recite functions that may run on a general-purpose computer does not make those

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