

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SUPERCELL OY,
Petitioner

v.

GREE, INC.,
Patent Owner

Case: PGR2018-00047
U.S. Patent No. 9,770,659

PATENT OWNER'S RESPONSE

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Patent Owner's Exhibit List

Exhibit No.	Exhibit Description
2001	Biography of Steven D. Moore
2002	Declaration of David Crane
2003	JP2007252696 and Machine Translation of Description
2004	File History of Patent Application No. 15/686268
2005	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
2006	Kevin Mullet & Darrell Sano, Designing Visual Interfaces – Communication Oriented Techniques (1995)

I. Introduction.

The challenged claims of the '659 patent are patentable. They are not directed to an abstract idea and 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 '659 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 '659 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 integrated into a subdivided display region that was previously unknown in the art. The challenged claims recite specific and concrete limitations for selecting, disposing, displaying, and animating these panels, along with the corresponding graphical user-interface elements for doing so. The Federal Circuit has consistently found such claims patentable. But Petitioner's analysis either ignores these limitations entirely or generalizes them to such a degree that they are rendered meaningless. And Petitioner provides almost no evidentiary support for its arguments.

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