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Paper 9
Date: June 26, 2015

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE, INC.,
Petitioner,

v.

CONTENTGUARD HOLDINGS, INC.,
Patent Owner.

Case IPR2015-00356
Patent 8,001,053 B2

Before KARL D. EASTHOM, GLENN J. PERRY, and MICHAEL J. FITZPATRICK, *Administrative Patent Judges*.

PERRY, *Administrative Patent Judge*.

DECISION
Denying Institution of *Inter Partes* Review
35 U.S.C. § 314(a) and 37 C.F.R. § 42.108

I. INTRODUCTION

Petitioner, Apple, Inc., filed a Petition to institute an *inter partes* review of claims 1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34 (the "challenged claims") of U.S. Patent No. 8,001,053 B2 (Ex. 1005, the "'053 patent"). Paper 1, "Pet." Apple's challenges are brought under 35 U.S.C. § 103(a). Patent Owner, ContentGuard Holdings, Inc., filed a Preliminary Response pursuant to 35 U.S.C. § 313. Paper 8, "Prelim. Resp."

We have authority to determine whether to institute an *inter partes* review. 35 U.S.C. § 314(b); 37 C.F.R. § 42.4(a). We deny the Petition.

A. The Asserted Grounds

Petitioner identifies the following as asserted grounds of unpatentability:

References	**Basis**	**Claims Challenged**
Gruse (Ex. 1008)[1]	§ 103(a)[2]	1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34
Gruse (Ex. 1008) and Wiggins (Ex. 1011)[3]	§ 103(a)	1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34

Pet. 3.

[1] U.S. Patent No. 6,389,538 B1 (May 14, 2002)(filed Oct. 22, 1998).
[2] The America Invents Act ("AIA"), Pub.L. No. 112-29, took effect on March 18, 2013. Because the application from which the '053 patent issued was filed before that date, our citations to Title 35 are to its pre-AIA version.
[3] U.S. Patent No. 5,717,604 (Feb. 10, 1998) (filed May 25, 1995).

II. THE ’053 PATENT

A. The Invention

The ’053 patent generally relates to systems and methods for digital rights management (“DRM”). Ex. 1005, 1:20–23, 1:48. The ’053 patent addresses the problem of downstream distribution by providing “meta-rights” which have the ability to spawn other user rights. *Id.* at 2:66–3:10. Figure 9 of the ’053 patent is reproduced below.

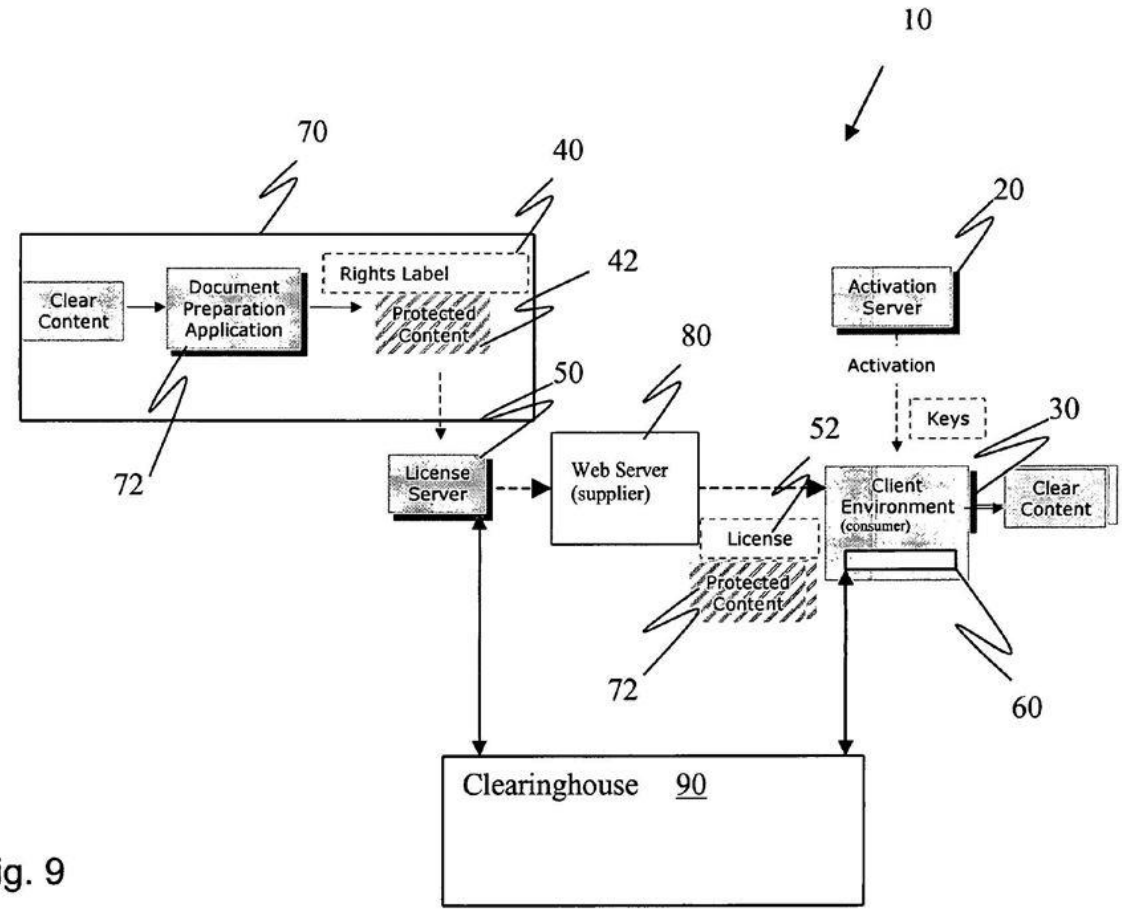

Fig. 9

Figure 9 is block diagram of a DRM system 10 that enforces usage rights and meta-rights for specific content and services. *Id.* at 2:15–18. A user activation component (server 20) issues public and private key pairs, or other identification mechanisms, to content users. Software, installed in client 30 associated with the content recipient, enforces usage rights for protected content. Client component 60 contains public and private keys issued by activation server 20. *Id.* at 4:20–35.

Rights label 40, associated with content 42, specifies usage rights and meta-rights that are available to a recipient, i.e. a consumer of rights, when corresponding conditions are satisfied. License Server 50 manages the encryption keys and issues licenses 52 for protected content 42. Licenses 52 embody data representing a granting of rights, including usage rights and meta-rights, to an end user.[4] Client component 60 interprets and enforces the rights, including usage rights and meta-rights, as specified in the license. *Id.* at 4:36–51.

B. The Challenged Claims

Apple challenges claims 1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34. Pet. 3. Claims 1, 15 and 26 are independent. Claim 1 is illustrative and reproduced below:

> 1. A method for sharing rights adapted to be associated with an item, the method comprising:

[4] For example, rights offer 40 may permit a user to view content for a fee of five dollars and print content for a fee of ten dollars, or it may permit a user to offer rights to another user, for example, by utilizing the concept of meta-rights. Ex. 1005, 4:43–46.

> specifying, in a first license, using a processor, at least one usage right and at least one meta-right for the item, wherein the usage right and the meta-right include at least one right that is shared among one or more users or devices;
>
> defining, via the at least one usage right, using a processor, a manner of use selected from a plurality of permitted manners of use for the item;
>
> defining, via the at least one meta-right, using a processor, a manner of rights creation for the item, wherein said at least one meta-right is enforceable by a repository and allows said one or more users or devices to create new rights;
>
> associating, using a processor, at least one state variable with the at least one right in the first license, wherein the at least one state variable identifies a location where a state of rights is tracked;
>
> generating, in a second license, using a processor, one or more rights based on the meta-right in the first license, wherein the one or more rights in the second license includes at least one right that is shared among one or more users or devices; and
>
> associating at least one state variable with the at least one right that is shared in the second license, wherein the at least one state variable that is associated with the second license is based on the at least one state variable that is associated with the first license.

III. ANALYSIS

A. Failure to Identify Related Matters

A petition for an *inter partes* review "may be considered only if," among other things, "the petition provides such other information as the Director may require by regulation." 35 U.S.C. § 312(a)(4). In that regard, the Director requires a petitioner to include certain mandatory notices with its petition. 37 C.F.R. § 42.8(a)(1). The mandatory notices include a requirement to "[i]dentify any other judicial or administrative matter that would affect, or be affected by, a decision in

the proceeding." 37 C.F.R. § 42.8(b)(2) (titled "Related matters"). "Judicial matters include actions involving the patent in federal court. Administrative matters include every application and patent claiming, or which may claim, the benefit of the priority of the filing date of the party's involved patent or application as well as any *ex parte* and *inter partes* reexaminations for an involved patent." Office Patent Trial Practice Guide, 77 Fed. Reg. 48,756, 48,760 (Aug. 14, 2012).

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioner identifies only the following related matters: *ContentGuard Holdings, Inc. v. Amazon.com, Inc.*, Case No. 2:13-cv-01112 (E.D. Tex.) (the "Texas lawsuit against Apple"); Cases IPR2015-00355, -00357, and -00358 (involving the '053 patent); and Cases IPR2015-00351, -00352, -00353, and -00354 (involving related U.S. Patent No. 7,774,280 B2 ("the '280 patent")). Pet. 2.

According to Patent Owner, however, there are numerous additional related matters: *Google Inc. v. ContentGuard Holdings, Inc.*, Case No. 14-cv-0498 (N.D. Cal.) (the "California lawsuit"); *ContentGuard Holdings, Inc. v. Google Inc.*, Case No. 14-cv-0061 (E.D. Tex.) (the "Texas lawsuit against Google"); pending U.S. Patent Application No. 13/162,826 (the "'826 application"), which is a continuation of the application from which the '053 patent issued; Case CBM2015-00040 (involving the '280 patent); and Case CBM2015-00043 (involving'053 patent).[5] Paper 7, 1–2.

[5] The petition in CBM2015-00043 was filed December 11, 2014, and, thus, did not exist when the instant Petition was filed on December 10, 2014. The petition in CBM2015-00040 was filed December 9, 2014, and, thus, we would not presume Petitioner was aware of it when it filed its Petition the next day.

Patent Owner is correct that the California lawsuit is a related matter, as it involves a declaratory judgment action for non-infringement of the '053 patent. Ex. 3001 ¶¶ 48–55. The Texas lawsuit against Google also is a related matter, as it involves an assertion of infringement of the '053 patent. Ex. 3002 ¶¶ 44–45. Thus, Petitioner should have identified both of those lawsuits in order to have its Petition considered. 35 U.S.C. § 312(a)(4); 37 C.F.R. § 42.8(b)(2). Although it is possible that Petitioner was not aware of the California lawsuit, it was informed of the Texas lawsuit against Google. *See* Ex. 3003 (Order denying Patent Owner's motion for consolidation of the Texas lawsuits, said order entered in the Texas lawsuit against Apple).

Patent Owner is also correct that the '826 application is related to the '053 patent. The '826 application was published on October 6, 2011, and it is listed in the child continuity data field in the Public PAIR search report of the '053 patent. Thus, Petitioner should have been aware of it and identified it in the Petition.

Additionally, Petitioner's Declarant, Atul Prakash, Ph.D., cites several PTAB decisions involving patents belonging to Patent Owner, as affecting the construction of claims of the '053 patent. *See* Ex. 1003 ¶ 284 (citing *ZTE Corp. v. ContentGuard Holdings Inc.*, Case IPR2013-00139, Paper 57 (PTAB June 26, 2014); *ZTE Corp. v. ContentGuard Holdings Inc.*, Case IPR2013-00133, Paper 61 (PTAB July 1, 2014); *ZTE Corp. v. ContentGuard Holdings Inc.*, Case IPR2013-00138, Paper 57 (PTAB July 1, 2014)); *see also* Ex. 1003 ¶ 285 (citing *ZTE Corp. v. ContentGuard Holdings Inc.*, Case IPR2013-00133, Paper 15 (PTAB July 1, 2013)). Yet, the Petition does not identify, as related matters, the *inter partes* reviews in which those decisions were rendered. Pet. 2.

The Petition's failure to comply with 37 C.F.R. § 42.8(b)(2), and thus also 35 U.S.C. § 312(a)(4), could be grounds for denial of the Petition. 35 U.S.C. § 312(a)(4); *cf. Reflectix, Inc., v. Promethian Insulation Tech. LLC*, 2015 WL 1927414, *9 (PTAB Apr. 24, 2015) (denying institution because petition did not comply with parallel requirement, under 35 U.S.C. § 312(a)(4), to identify all real parties-in-interest). It is unnecessary to determine whether to deny the Petition on that basis, however, because the Petition is denied for additional reasons, as explained below.

B. Obviousness Based on Gruse

Apple contends that claims 1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34 are unpatentable under 35 U.S.C. § 103(a) over Gruse. Apple explains how Gruse purportedly teaches the claimed subject matter of each challenged claim, and relies upon the Declaration testimony of Dr. Prakash to support its positions. Pet. 21–51; Ex. 1003. We have considered Apple's explanations and supporting evidence, but we are not persuaded Apple has presented sufficient evidence to support a finding that Gruse renders obvious the challenged claims.

1. Principles of Law

A claim is unpatentable under § 103(a) if the differences between the claimed subject matter and the prior art are such that the subject matter, as a whole, would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. *KSR Int'l Co. v. Teleflex Inc*., 550 U.S. 398, 406 (2007). The question of obviousness is resolved on the basis of underlying factual determinations, including: (1) the scope and content of the prior art; (2) any differences between the claimed subject matter and

the prior art; (3) the level of skill in the art; and (4) where in evidence, so-called secondary considerations. *Graham v. John Deere Co.*, 383 U.S. 1, 17–18 (1966). We analyze this asserted ground based on obviousness with the principles identified above in mind.

2. Gruse Generally

Gruse generally relates to the field of electronic commerce and, in particular, to tools for the secure delivery and rights management of digital assets, such as print media, films, games, and music, over global communications networks. Ex. 1008, 1:58–63. Figure 6 of Gruse, reproduced below, illustrates a block diagram of content distribution and licensing control as it applies to the license control layer of the secure digital content electronic distribution system.

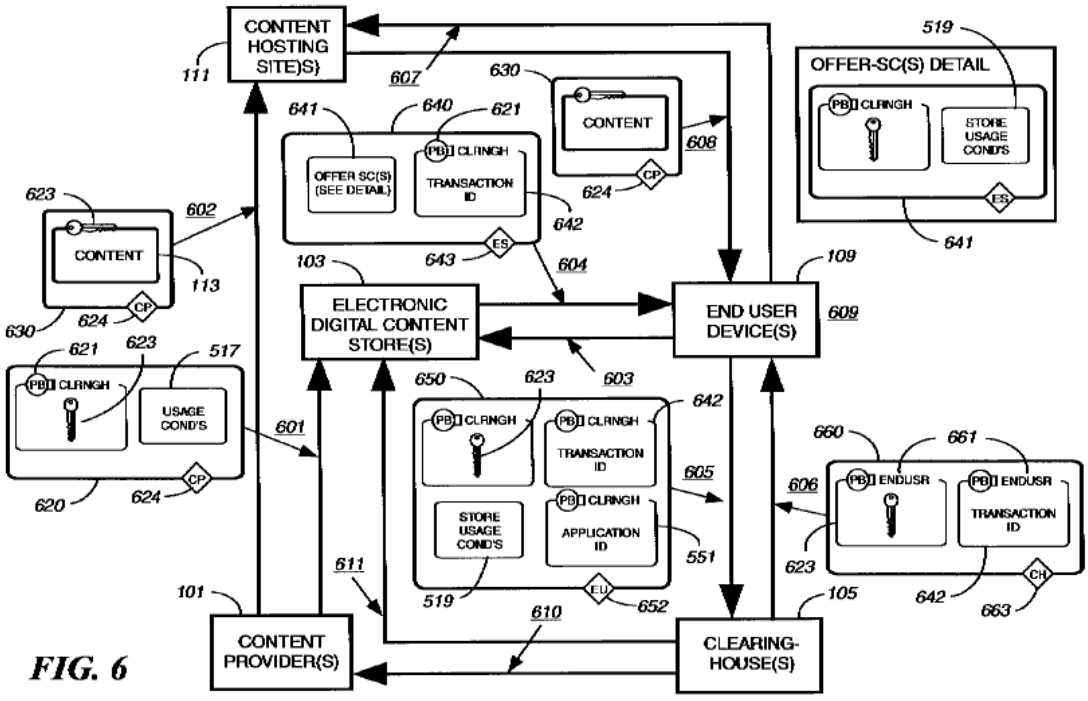

FIG. 6

As shown in Figure 6 of Gruse, secure digital content electronic distribution system 100 (not labeled in Figure 6) includes, amongst other things, content provider 101 or content proprietor, electronic digital content store 103, clearinghouse 105, and end-user device 109. Ex. 1008, 11:52–59. Content provider 101 or content proprietor are the owners of original content 113 or, alternatively, distributors authorized to package independent content 113 for further distribution. *Id*. at 11:66–12:1. Electronic digital content store 103 is an entity that markets content 113 through a wide variety of services or applications, such as content 113 theme programming or electronic merchandising of content 113. *Id*. at 12:57–60. Clearinghouse 105 provides licensing authorization and record keeping for all transactions that relate to the sale or permitted use of content 113 encrypted in a secure container ("SC"). *Id*. at 13:45–48. End-user device 109 may be any player device that contains end-user player application 195 compliant with the specifications of secure digital content electronic distribution system 100. *Id*. at 14:24–27.

When a digital content label, e.g., a music label such as Sony, Time-Warner, etc., decides to allow electronic digital content store 103 to sell its content 113, the electronic digital content store contacts clearinghouse 105 with a request indicating that it would like to be added to secure digital content electronic distribution system 100. Ex. 1008, 44:58–63. The digital content label provides the name of the applicable electronic digital content store, as well as any other information that might be required, to clearinghouse 105, which, in turn, allows clearinghouse 105 to create a digital certificate for the electronic digital content store. *Id*. at 44:63–67.

The digital certificate for the electronic digital content store then is sent to the digital content label in a secure fashion, after which it is forwarded by the digital content label to the electronic digital content store. Ex. 1008, 44:67–45:3. After the electronic digital content store has received the digital certificate that was created by clearinghouse 105, along with the necessary tools for processing the SC from the digital content label, the electronic digital content store may begin to offer content 113 for purchase by end-users 105. *Id*. at 45:17–21.

Clearinghouse 105 maintains a database of the digital certificates that it has assigned to each electronic digital content store 103. Ex. 1008, 45:3–5. Clearinghouse 105 also maintains a digital certificate revocation list. *Id*. at 45:31–32. According to Gruse, end-user device 109 verifies that an electronic digital content store is a valid distributor of content 113 on secure digital content electronic distribution system 100 by first checking the digital certificate revocation list, and then using public key 621 of clearinghouse 105 to verify the information in the digital certificate for the electronic digital content store. *Id*. at 45:24–31.

3. Applying Gruse

Although the discussion below focuses on independent claim 1, it also applies to independent claims 15 and 26, which recite analogous limitations.

The Petition identifies various elements of Gruse alleged to have similar functionality to those of the various limitations of the claims. Pet. 25–56. However, the Petition does not articulate clearly the differences between the Gruse disclosures and what is required by the claims, let alone explain how those differences are to be bridged and why one of only ordinary skill would bridge

them. Rather, it argues that Gruse "suggests a range of possible implementations of its scheme" that would have "rendered obvious variations of the processes, systems and devices it expressly describes." Pet. 46.

There are many ways to manage digital rights. We note the '053 patent itself, the various prior art references cited in the Petition and the various record citations within those prior art references. Merely suggesting a range of possible implementations without clearly demonstrating specific differences and how and why one of ordinary skill would have bridged them does not render one implementation obvious in view of another. The approach taken in the Petition leaves the Board to speculate about how the various Gruse elements having similar functionality to claimed elements would be modified to arrive at the claimed subject matter, and the rationale for why a person of ordinary skill would have made the modification. In taking a generalized approach suggesting a range of possible implementations, some of which may fall within the scope of the challenged claims, the Petition falls short of establishing obviousness of the challenged claims. ContentGuard argues (Prelim. Resp.) specific problematic positions taken by the Petition, some of which we discuss below.

ContentGuard argues that Gruse fails to disclose specifying at least one "meta-right" in a "first license," and defining via that "meta-right" a manner of rights creation for an item, the "meta-right" being enforceable by a "repository." Prelim. Resp. 34–42.

Claim 1 describes separate and distinct "usage rights" and "meta-rights." A "usage right" specifies a manner of use (*e.g.* permitted to play the item three times on a particular type of player). In contrast, a "meta-right" specifies how a further

right (*e.g.* another usage right) is to be created and is not itself a usage right that would permit the item to be used. Apple contends that the end-user's right in Gruse to "create a second copy of the digital content or the right to copy the digital content to an external portable device" satisfies the claimed "meta-right." Pet. 26–27. Apple asserts that the copy/play code embedded in the secondary copy corresponds to the "usage right." Pet. 28. Apple asserts that each of the Gruse original and secondary copies has its own separate "license watermark," corresponding to the claimed first and second licenses. Pet. 28. In that case, a usage right embodied in code in a secondary copy would not be associated with the "first license." Thus, we are not persuaded by the Petition that Gruse discloses a "usage-right" and a "meta-right" in the first license, as required by claim 1.

Each of the independent claims requires that a "meta-right" be "enforceable" by a "repository." Apple reads the Gruse "end-user device" as the claimed "repository." Pet. 33. However, the Petition does not demonstrate that Gruse discloses a repository as required. For example, the Petition does not demonstrate that the Gruse end-user device meets the behavioral integrity and communications integrity requirements of being a "repository." We agree with both the previous Board panel's and the District Court's definition of "behavioral integrity" as requiring software including a digital certificate in order to be installed in the repository. Ex. 1040, 13; Ex. 2001, 19–21. The Petition observes that in Gruse, conditions are verified before content can be descrambled and played or copied. Pet. 33. It then summarily concludes that the end-user devices exhibit both physical integrity and behavioral integrity. We agree with ContentGuard that scrambling and descrambling of content has no clear relevance to behavioral

integrity as previously construed by the Board, as it does not ensure that software is trusted before being installed on the end-user device. Gruse does not recognize the benefits of providing behavioral integrity to end-user devices and fails to disclose any component or methodology for providing this security integrity.

Gruse does not disclose "at least one state variable . . .[that] identifies a location where a state of rights is tracked" and "associating, using a processor, at least one state variable with the at least one right in the first license, wherein the at least one state variable identifies a location where a state of rights is tracked."

The Petition asserts that "the parameters in Gruse also are variables that identify 'a named storage location capable of containing data that can be modified during program execution.'" Pet. 35. In support, the Petition refers to a "MS Computer Dictionary" (Ex. 1033) and the Prakash Declaration (Ex. 1003). We agree with ContentGuard that the application of Gruse to the claim requirement is not consistent with the cited dictionary definition of "variable." The relied-upon dictionary defines "variable" as a "named storage location;" it does not state that a variable identifies a named storage location as alleged in the Petition. Pet. 35. The definition of "variable" merely states that a variable is a storage location with a name, and says nothing whatsoever about whether Gruse discloses a "state variable" that identifies a location. Ex. 1003. The cited paragraphs of the Prakash Declaration are not helpful in that they only repeat the same statements made in the Petition. The Petition does not point to any teaching in Gruse meeting the claim requirement.

The Petition does not establish that Gruse describes "associating at least one state variable with the at least one right that is shared in the second license . . .

based on the at least one state variable that is associated with the first license." The Petition asserts that when the digital content is copied to external media or a portable device, the parameters ("state variables") used to track the state of the rights in any secondary copy of that device (i.e., rights in the second license") are associated with right to copy or play content ("usage rights") in the original license granted to the primary device." Pet. at 38. The Petition points to several sections of Gruse in relation to this assertion that relate to updating the watermark on a single license or state that a copy of a content item also has a license watermark. Ex. 1008, 10:34–60, 14:34–46, 23:29–38, 55:16–24, 63:14–46.

ContentGuard argues that the only passage in Gruse that may be relevant to updating copy/play codes in both the primary and secondary copies appears to be in col. 25, lines 54–56. Prelim. Resp. 44–46. This passage states that an end-user device "also appropriately updates the copy/play code in the original copy of the Content 113 and on any new secondary copy." However, Gruse provides no detail as to how the copy/play code in the secondary copy is specified, and provides no description as to how a first end-user device can update the copy/play code on a "secondary device." Usage conditions are enforced by a local application that updates the license watermark attached to content. Thus, Gruse does not describe how a user device enforces the license watermark on another user device.

Based on the record before us, Apple has not demonstrated a reasonable likelihood that it will prevail on its assertion that claims 1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34 would have been obvious over Gruse.

C. Obviousness Based on the Combination of Gruse and Wiggins

Apple contends that claims 1–5, 8, 11–16, 19, 22, 24–28, 31, and 34 are unpatentable under 35 U.S.C. § 103(a) over the combination of Gruse and Wiggins. Pet. 46–47 and 51–56. In this asserted ground, Apple does not apply the teachings of Wiggins in such a way that remedies the deficiencies in Gruse discussed above. Therefore, for essentially the same reasons discussed above, Apple has not demonstrated a reasonable likelihood that it will prevail on its assertion that the challenged claims would have been obvious over the combination of Gruse and Wiggins.

Petitioner cites Wiggins for its teaching of a global variable to track the number of concurrent users of a software application to ensure compliance with license restrictions in a "shared license pool" model for sharing software on a network server among multiple client computers. Pet. 53. Petitioner argues that this global variable satisfies the "state variable" limitation of the challenged claims.

Petitioner points to Wiggins' "license compliance file" containing a variable specifying the maximum number of concurrent users allowed to use the software application. *Id.* Petitioner notes that the "license compliance file" may be stored on a network server from which the protected software is accessed. *Id.* at 54. Petitioner argues that "a person would have considered it obvious to modify the Gruse scheme to use the "shared license pool" technique shown in Wiggins, citing to Ex. 1003 ¶¶ 538, 881. Petitioner argues that the person would have recognized that both the primary and any secondary devices in Gruse "could share" the state of rights and conditions in each device by contacting the server before accessing the

digital content. *Id.* at 55–56. Petitioner concludes that combining Gruse and Wiggins would have only united well-known and old elements with no change in their respective functions to yield a predictable result. Moreover, Petitioner asserts that adapting the Gruse scheme, such as by storing state variable information associated with either the "first" or "second" license on a network server as suggested by Wiggins, would have been an obvious design choice recognized as a solution to the challenge of regulating concurrent use of protected content by multiple devices. *See* Ex. 1003 ¶¶ 543, 881.

The argument that Wiggins teaches techniques for sharing licenses among a pool of networked computers does not establish the obviousness of the challenged claims. As stated above with respect to Gruse alone, there are many ways to manage digital rights. The '053 patent describes and claims a particular scheme among the many possible schemes. In the absence of specific reasoning bridging stated differences, the existence of another scheme, such as Gruse or Wiggins, among the many possible schemes, does not render the claimed scheme a matter of design choice. The Petition does not suggest how Gruse would be modified based on Wiggins other than general statements suggesting that "variations" would be obvious to those of ordinary skill.

Based on the record before us, Apple has not demonstrated a reasonable likelihood that it will prevail on its assertion that claims 1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34 would have been obvious over Gruse and Wiggins.

D. Additional Considerations

The Director requires us to apply our trial rules "to secure the just, speedy, and inexpensive resolution of every proceeding." 37 C.F.R. § 42.1. No such proceeding could be secured with the record presented to us by Petitioner.

Dr. Prakash's Declaration is an omnibus declaration used by Petitioner in eight separate Petitions, collectively challenging both the '053 patent and the related '280 patent with four sets of prior art each.[6] The declaration is 342 pages, includes voluminous information not relevant to this Petition, and contains numerous self-citations.

The Petition includes sixty-one exhibits totaling 30,298 pages. *See* Exs. 1001–1061. Petitioner asserts that all exhibits are relied upon in the Petition. *See* Pet., at "Attachment B" (subtitled "List of Evidence and Exhibits Relied Upon in Petition"). Fifty-one of the exhibits, however, are not cited in the Petition.[7] Although some of those fifty-one exhibits are cited in Dr. Prakash's Declaration, several of them are not. Also, mere citation of an exhibit in Dr. Prakash's Declaration should not be equated with being relied upon in the Petition, because the Declaration is being offered in seven other IPR petitions, each of which challenges a different patent and/or asserts a different set of prior art.

The Office Patent Trial Practice Guide cautions that petitioners should "avoid submitting a repository of all the information that a judge could possibly consider, and instead focus on concise, well-organized, easy-to-follow arguments

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[6] Cases IPR2015-00351 through -00358.
[7] Only Exhibits 1001, 1003, 1005, 1008, 1009, 1010, 1012, 1025, 1026, and 1035 are cited in the Petition.

supported by readily identifiable evidence of record." 77 Fed. Reg. at 48,763. The Petition widely misses that mark.

IV. CONCLUSION

Taking into account the arguments presented in the Preliminary Response, we conclude that the information presented in the Petition does not establish that there is a reasonable likelihood that Petitioner will prevail in challenging claims 1–5, 8, 9, 15–19, 22, 23, 26–30, 33 and 34 of the '053 patent as unpatentable under 35 U.S.C. § 103(a).

V. ORDER

In consideration of the foregoing, it is ORDERED that the Petition is DENIED and no trial is instituted.

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