

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

QUOTIENT TECHNOLOGY, INC.,
Petitioner,

v.

INTELLIGENT CLEARING NETWORK INC.,
Patent Owner.

Case No. IPR2024-01324

U.S. Patent No. 9,098,855

Petitioner's Reply To Patent Owner's Preliminary Response

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Patent Trial and Appeal Board
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TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION	1
II. ARGUMENT	1

I. INTRODUCTION

In its Preliminary Response (“POPR”), Patent Owner argued that the “coupon redemption validation” process conducted by the server in prior art reference U.S. Patent No. 6,993,498 (Ex-1004) (“Deaton”) is limited to the “process of crediting a store for a coupon redemption that has already occurred,” and therefore, allegedly does not describe validating “for redemption.” But as demonstrated in the Petition and further below, the Deaton reference clearly discloses a server configured to validate a coupon for redemption in real-time. Thus, Patent Owner’s arguments should be rejected.

II. ARGUMENT

Element 1[g] of Claim 1 recites, among other limitations, a server configured to “validate the first coupon or incentive related information for redemption based at least in part on the universal product codes.” As demonstrated in the Petition, Deaton discloses a system that uses terminals and controllers to scan and transmit coupon information to a server. Petition, at 14-18; see Deaton, 5:39-43 (“According to the teachings of the invention, point-of-sale information is communicated through communication link 24 to UPC server 12.”). Further, Deaton discloses that the server is then capable of “facilitating coupon redemption validation and electronic crediting.” Deaton, 10:63-65; Petition, at 19. Therefore, Deaton discloses a server capable of validating coupon information for redemption.

Instead of addressing these clear teachings from Deaton, Patent Owner argues that Deaton teaches “a process of ‘redemption validation and electronic crediting’” (conspicuously omitting the term “coupon” from the quoted portion of Deaton) that is limited to “a process of crediting a store for a coupon redemption that has already occurred.” POPR, at 30-33. According to the Patent Owner, “[t]his does not disclose or suggest any validation of ‘the first coupon or incentive related information for redemption,’ as claimed.” POPR, at 31.

But nothing in the cited portions of Deaton states the “coupon redemption validation” process is limited to validating coupons after a redemption has occurred. Instead, the quoted portion only states that after the manufacturer validates the proper redemption of the coupon (which could occur in real-time for redemption), and then thereafter, the manufacturer would provide a credit to the store. Deaton, at 11:4-6. The manufacturer in Deaton would have been capable of verifying the coupon in real-time and would not be limited to verification after the fact.

Indeed, Deaton repeatedly explains that information between the controllers, server, and manufacturers is transmitted in real-time. Deaton, 1:66-2:2 (“Embodiments of the invention provide numerous technical advantages. For example, in one embodiment of the invention, a manufacturer is provided access to real-time product purchase information.”); 3:47:49 (“point-of-sale information obtained at store 14 is communicated on a substantially real-time basis to UPC

server”); 4:18-21 (“By providing point-of-sale information on a substantially real-time basis to, for example, manufacturer 16, individualized customer incentives may be provided by the manufacturer.”); see also, e.g., *id.* at 4:1-12; 4:29-34; 4:57-63; 8:6-9; 19:13-17; 10:53-57. As a result of using real-time exchanges, Deaton explains that the manufacturer has the ability to intercede after receiving point-of-sale information from the server, further demonstrating that the manufacturer was capable of validating coupons for redemption in real-time. *Id.*, at 8:6-22.

Thus, limiting the “coupon redemption validation” process in Deaton to redemptions that have already occurred would be illogical in light of the repeated disclosure of real-time transmissions between the controllers, server, and manufacturer. Indeed, Deaton clearly explains that using real-time transmissions is one of the “numerous technical advantages” of the disclosed invention. *Id.* at 1:66-2:2. The “coupon redemption validation” process in Deaton is therefore not limited to redemption of coupons after redemption has already occurred.

The server in Deaton includes software to “also perform[] this validation,” and as such, the server can be configured to “validate the first coupon or incentive related information for redemption.” For at least these reasons, the Patent Owner’s argument that Deaton does not meet Element 1[g] should be rejected.

DATED: February 10, 2025

Respectfully Submitted,

/Brian M. Buroker/

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CERTIFICATE OF SERVICE

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6 of a copy of this **Petitioner's Reply To Patent Owner's Preliminary Response** upon Patent Owner by email on February 10, 2025, to the following email address of record: whelge@bdiplaw.com, jwilson@bdiplaw.com, and erobinson@bdiplaw.com.

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