

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Serial No. 16/399,349
Filing Date..... April 30, 2019
Confirmation No. 4043
First Named Inventor Michael Montazeri
Group Art Unit 2173
Examiner Tadesse Hailu
Attorney's Docket No. S392-0027US
Title: Group-Based Communication System And Apparatus Configured To Manage User-Defined
Channel Labels Associated With A Plurality Of Group-Based Communication Channels

RESPONSE TO NON-FINAL OFFICE ACTION DATED MARCH 9, 2020

To: Commissioner of Patents
Mail Stop Amendment
PO Box 1450
Alexandria, VA 22313-1450

From: Melissa J. Coombes (Tel. 509-944-4631; Fax 509-323-8979)
Lee & Hayes, P.C.
601 W. Riverside Avenue, Suite 1400
Spokane, WA 99201

Customer No. 126350

INTRODUCTORY COMMENTS

This communication is responsive to the Non-Final Office Action dated March 9, 2020 (the "Office Action") in the above-captioned application. No fees are believed to be due; however, Applicant hereby authorizes the Commissioner to charge any deficiency of fees and credit any overpayments to Deposit Account Number 12-0769.

A Listing of the Claims begins on page 2 of this paper.

A Statement of the Interview begins on page 11 of this paper.

Remarks begin on page 12 of this paper.

A LISTING OF THE CLAIMS

Claims pending

- At time of the Office Action: 1, 2, 4-12, 14, 15, and 17-25
- After this Response: 1, 2, 4-12, 14, 15, 17-22, 24, 25, and 55

Currently Amended claims: 1, 2, 4-12, 14, 15, 17-22, and 24

Currently Canceled claims: 23

New claims: 55

1. (Currently Amended) A group-based communication apparatus configured to manage ~~group-based communication channels of a group-based communication interface comprising a sidebar pane and a message pane~~, the group-based communication apparatus comprising at least one processor and at least one memory, the at least one memory having computer-coded instructions therein, wherein the computer-coded instructions are configured to, in execution with the at least one processor, cause the group-based communication apparatus to:

receive a user identifier;

access a first plurality of permitted group-based communication channels of the communication channels based on the user identifier;

cause rendering of first group-defined titles associated with the first plurality of permitted group-based communication channels to ~~[[the]]~~ a first sidebar pane of a user interface associated with the user identifier based on group defined titles for the plurality of permitted group-based communication channels;

receive, from a first client device associated with the user identifier, a sidebar label focus-request to view one or more communication channels of the first plurality of communication channels that are associated with a user-defined channel label comprising a user-defined channel label identifier;

identify the one or more communication channels associated with a label focused channel set of the plurality of permitted group-based communication channels based on the user-defined channel label identifier based on the request; and

modify the first sidebar pane of the user interface to include cause rendering of the label-focused channel set the one or more communication channels the sidebar pane of the group-based communication interface.

2. (Currently Amended) The group-based communication apparatus of claim 1, wherein the group-based communication apparatus is further configured to:

cause ordering of the ~~label focused channel set~~ one or more communication channels within the first sidebar pane of the ~~group-based communication user~~ interface based on the first group-defined titles associated with the one or more communication channels ~~for the plurality of group-based communication channels~~.

3. (Canceled)

4. (Currently Amended) The group-based communication apparatus of claim 1, wherein the user-defined channel label ~~identifier~~ comprises an author identifier matching the user identifier.

5. (Currently Amended) The group-based communication apparatus of claim 1, wherein the user-defined channel label ~~identifier~~ comprises an author identifier that does not match the user identifier.

6. (Currently Amended) The group-based communication apparatus of claim 4, wherein the group-based communication apparatus is further configured to:

receive a user-defined channel label share request comprising the author identifier, the user-defined channel label ~~identifier~~, and a share recipient identifier; and

cause transmission of a user-defined channel label share message to a second client device associated with the share recipient identifier, wherein the user-defined channel label share message comprises the author identifier and the user-defined channel label ~~identifier~~.

7. (Currently Amended) The group-based communication apparatus of claim 6, wherein the group-based communication apparatus is further configured to:

receive a user-defined channel label share confirmation from the second client device associated with the share recipient identifier; and

in response to receiving the user-defined channel label share confirmation, cause storage of the user-defined channel label ~~identifier~~ to a channel label ~~identifier~~-repository associated with the share recipient identifier.

8. (Currently Amended) The group-based communication apparatus of claim 7, wherein the group-based communication apparatus is further configured to:

access a second plurality of ~~permitted group-based~~ communication channels based on the share recipient identifier;

cause rendering of second group-defined titles associated with the second plurality of ~~permitted group-based~~ communication channels to a second sidebar pane of a second ~~group-based communication~~ user interface of the second client device ~~based on the group-defined titles~~;

receive, from the second client device, a second ~~sidebar label focus-request to~~ view the one or more communication channels associated with ~~comprising the user-defined channel label identifier~~;

~~identify a second label focused channel set of the second plurality of permitted group-based communication channels based on the user-defined channel label identifier;~~
and

modify the second sidebar pane of the second user interface to include the ~~cause rendering of the second label focused channel set one or more communication channels to the second sidebar pane of the second group-based communication interface.~~

9. (Currently Amended) The group-based communication apparatus of claim 1, wherein the group-based communication apparatus is further configured to:

cause rendering of a user-defined label selection interface component in association with the rendering of the ~~permitted group-based~~ communication channels;

receive a user-defined label selection command in response to user engagement with the user-defined label selection interface component, the user-defined label selection command comprising a user-defined label text string, the user identifier, and a selected ~~group-based~~ communication channel identifier associated with at least one of the ~~permitted group-based~~ communication channels;

determine a new user-defined channel label ~~identifier~~ for association with the user-defined label text string; and

cause storage of the new user-defined channel label ~~identifier~~ to a channel label ~~identifier~~ repository associated with the user identifier.

10. (Currently Amended) The group-based communication apparatus of claim 9, wherein the group-based communication apparatus is further configured to:

cause storage of the user-defined label text string and the selected group-based communication channel identifier to the channel label ~~identifier~~ repository in association with the new user-defined channel label ~~identifier~~.

11. (Currently Amended) The group-based communication apparatus of claim 10, wherein the request to view the one or more communication channels comprises a first request and wherein the group-based communication apparatus is further configured to:

receive, from the first client device, a second ~~sidebar label focus~~ request to view the at least one of the communication channels associated with ~~comprising~~ the new user-defined channel label ~~identifier~~;

~~identify a new label focused channel set of the plurality of permitted group-based communication channels based on the new user-defined channel label identifier; and~~

modifying the first sidebar pane of the first user interface to include ~~cause rendering of the new label focused channel set~~ the at least one of the communication channels to the sidebar pane of the group-based communication interface.

12. (Currently Amended) The group-based communication apparatus of claim 1, wherein the group-based communication apparatus is further configured to:

receive, from the first client device, a sidebar default request; and

cause rendering of the plurality of ~~permitted group-based~~ communication channels to the first sidebar pane based on the first group-defined titles for the plurality of ~~permitted group-based~~ communication channels.

13. (Canceled)

14. (Currently Amended) A computer implemented method for managing ~~group-based~~ communication channels associated with a communication platform of a group-based communication interface comprising a sidebar pane and a message pane, the computer implemented method comprising:

receiving a user identifier;

accessing a first plurality of ~~permitted group-based~~ communication channels of the communication channels based on the user identifier;

causing rendering of first group-defined titles associated with the first plurality of ~~permitted group-based~~ communication channels to [[the]]a first sidebar pane of a user interface associated with the user identifier based on group-defined titles for the plurality of ~~permitted group-based~~ communication channels;

receiving, from a first client device associated with the user identifier, a ~~sidebar label focus~~ request to view one or more communication channels of the first plurality of communication channels that are associated with a user-defined channel label comprising a user-defined channel label identifier;

identifying the one or more communication channels associated with a label-focused channel set of the plurality of permitted group-based communication channels based on the user-defined channel label identifier based on the request; and

causing rendering of the ~~label-focused channel set~~ one or more communication channels to the first sidebar pane of the ~~group-based communication user interface~~ based on the request.

15. (Currently Amended) The computer implemented method of claim 14 further comprising:

causing ordering of the ~~label-focused channel set~~ one or more communication channels within the first sidebar pane of the ~~group-based communication user interface~~ based on the first group-defined titles associated with the one or more communication channels ~~for the plurality of group-based communication channels~~.

16. (Canceled)

17. (Currently Amended) The computer implemented method of claim 14, wherein the user-defined channel label ~~identifier~~ comprises an author identifier matching the user identifier.

18. (Currently Amended) The computer implemented method of claim 14, wherein the user-defined channel label ~~identifier~~ comprises an author identifier that does not match the user identifier.

19. (Currently Amended) The computer implemented method of claim 17 further comprising:

receiving a user-defined channel label share request comprising the author identifier, the user-defined channel label ~~identifier~~, and a share recipient identifier;

causing transmission of a user-defined channel label share message to a second client device associated with the share recipient identifier, wherein the user-defined channel label share message comprises the author identifier and the user-defined channel label ~~identifier~~.

20. (Currently Amended) The computer implemented method of claim 19 further comprising:

receiving a user-defined channel label share confirmation from the second client device associated with the share recipient identifier; and

in response to receiving the user-defined channel label share confirmation, causing storage of the user-defined channel label ~~identifier~~ to a channel label ~~identifier~~ repository associated with the share recipient identifier.

21. (Currently Amended) The computer implemented method of claim 20 further comprising:

accessing a second plurality of ~~permitted group-based~~ communication channels based on the share recipient identifier;

causing rendering of second group-defined titles associated with the second plurality of ~~permitted group-based~~ communication channels to a second sidebar pane of a second ~~group-based communication~~ user interface of the second client device ~~based on the group-defined titles~~;

receiving, from the second client device, a second ~~sidebar label focus request to~~ view the one or more communication channels associated with ~~comprising the user-defined channel label identifier~~;

~~identifying a second label focused channel set of the second plurality of permitted group-based communication channels based on the user-defined channel label identifier;~~
and

causing rendering of the ~~second label focused channel set~~ one or more communication channels to the second sidebar pane of the second ~~group-based communication~~ user interface.

22. (Currently Amended) The computer implemented method of claim 14 further comprising:

causing rendering of a user-defined label selection interface component in association with the rendering of the ~~permitted group-based~~ communication channels;

receiving a user-defined label selection command in response to user engagement with the user-defined label selection interface component, the user-defined label selection command comprising a user-defined label ~~text string~~, the user identifier, and a selected ~~group-based~~ communication channel identifier associated with at least one of the ~~permitted group-based~~ communication channels;

determining a new user-defined channel label ~~identifier~~ for association with the user-defined label ~~text string~~; and

causing storage of the new user-defined channel label ~~identifier~~ to a channel label ~~identifier~~ repository associated with the user identifier.

23. (Canceled)

24. (Currently Amended) The computer implemented method of claim 23 further comprising:

receiving, from the first client device, a second ~~sidebar label focus request to view~~ the at least one of the communication channels associated with ~~comprising~~ the new user-defined channel label ~~identifier~~;

~~identifying a new label focused channel set of the plurality of permitted group-based communication channels based on the new user-defined channel label identifier;~~
and

causing rendering of the ~~new label focused channel set~~ at least one of the communication channels to the first sidebar pane of the ~~group-based communication user~~ interface.

25. (Currently Amended) The computer implemented method of claim 14 further comprising:

receiving, from the first client device, a sidebar default request; and

causing rendering of the first plurality of ~~permitted group-based~~ communication channels to the first sidebar pane based on the first group-defined titles for the first plurality of ~~permitted group-based~~ communication channels.

26–54. (Canceled)

55. (New) A system associated with a communication platform, the system comprising:

- one or more processors; and

- one or more computer readable media storing instructions that, when executed by the one or more processors, cause the system to perform operations comprising:

 - receiving a user identifier;

 - accessing a first plurality of communication channels of the group-based communication channels based on the user identifier;

 - rendering first group-defined titles associated with the first plurality of communication channels on a first sidebar pane of a user interface associated with the user identifier;

 - receiving, from a first client device associated with the user identifier and via the user interface, a request to view one or more communication channels of the first plurality of communication channels that are associated with a user-defined channel label;

 - identifying the one or more communication channels associated with the user-defined channel label; and

 - modifying the first sidebar pane of the user interface to present the one or more communication channels based on the request.

STATEMENT OF SUBSTANCE OF THE INTERVIEW

Applicant would like to thank Examiner Hailu for conducting a telephonic interview with Applicant's attorney, Melissa J. Coombes, on April 30, 2020.

During the interview, the Examiner and Applicant's attorney discussed the differences between the claims and the cited reference and potential clarifying amendments to further distinguish the claims from the cited reference. Examiner Hailu was receptive to the proposed amendments but asked that the amendments and remarks be submitted in writing for formal consideration. No agreement with regard to allowability was reached.

Additionally, the Examiner and Applicant's attorney discussed the objection to the drawings. Applicant's attorney understood the Examiner to agree that an amendment to claims 8 and 21 clarifying that the "second side bar pane" is associated with a second instance of a user interface on a second computing device would be sufficient to obviate the objection. Applicant thanks the Examiner for this indication and amends claims 8 and 21 herein.

Applicant also sincerely thanks the Examiner for the courtesy extended in conducting the interview and invites the Examiner to contact the undersigned attorney should any issue arise which may preclude issuance of this application.

REMARKS

Applicant respectfully requests reconsideration and allowance of the pending claims. Applicant herein amends claims 1, 2, 4-12, 14, 15, 17-22, and 24, while canceling claim 23, and adding claim 55. Therefore, claims 1, 2, 4-12, 14, 15, 17-22, 24, 25, and 55 are pending, with claims 1, 14, and 55 being independent. Support for the amendments and new claim can be found in Applicant's originally filed specification, at least at paragraphs [0044]-[0046], [0068], [0069], and [00117]-[00136], and the associated figures. The amendments and new claim do not present new matter.

DRAWING OBJECTIONS

FIGS. 1-11 stand objected to as allegedly failing to "show every feature of the invention specified in the claims." *Office Action*, p. 2. Applicant respectfully traverses the objection and submits that the amendments to claims 8 and 21 presented herein address the objections to the drawings. Applicant's attorney understood the Examiner to agree during the interview that an amendment, such as that presented herein, would be sufficient to overcome the pending objections. Applicant thanks the Examiner for this indication.

ALLOWABLE SUBJECT MATTER

In the Office Action, the Office indicates that claims 8 and 21 would be allowable if re-written in independent form. Applicant sincerely thanks the Office for this indication. Claims 8 and 21 are amended herein for clarity and consistency with the independent claims from which they depend and, as amended, claims 8 and 21 remain allowable.

CITED DOCUMENTS

The Office applies the following to reject one or more claims of the Application:

- **Kakuta:** Kakuta et al., U.S. Patent No. 6,630,944

CLAIMS 1, 2, 4-7, 9-12, 14, 15, 17-20, AND 22-25 ARE PATENTABLE OVER KAKUTA

Claims 1, 2, 4-7, 9-12, 14-15, 17-20, and 22-25 stand rejected under 35 U.S.C. § 102(a)(1) as allegedly being anticipated by Kakuta. Applicant respectfully submits that these claims stand allowable as listed above and discussed below.

Independent Claim 1

Claim 1, as amended herein, recites, in part:

...
receive a user identifier;
access a first plurality of communication channels of the communication channels based on the user identifier;
cause rendering of first group-defined titles associated with the first plurality of communication channels to a first sidebar pane of a user interface associated with the user identifier;
receive, from a first client device associated with the user identifier, a request to view one or more communication channels of the first plurality of communication channels that are associated with a user-defined channel label;
identify the one or more communication channels associated with the user-defined channel label based on the request; and
modify the first pane of the user interface to include the one or more communication channels.

Kakuta describes a method “for displaying conversations on a network for ease of viewing in accordance with user preferences.” *Kakuta*, Abstract.

However, Kakuta does not disclose at least “caus[ing] rendering of first group-defined titles associated with the first plurality of communication channels to a first sidebar pane of a user interface associated with the user identifier,” as amended claim 1 recites.

In the rejection of claim 1, the Office cites Kakuta, column 8, lines 20-29 as allegedly disclosing, “cause rendering of the first plurality of permitted group-based communication channels to the first sidebar pane based on first group-defined titles of the first plurality of permitted group-based communication channels.” *Office Action*, p. 4. Applicant respectfully disagrees. Kakuta describes a group chatting interface with a “user window 302” including a list of the people included in a group chat and a “chat window 303” displaying the messages associated with the group chat. *See Kakuta*, col. 7, ll. 65-67. However, neither the user window nor the chat window described in Kakuta

constitutes “group-defined titles associated with the first plurality of communication channels to a first sidebar pane of a user interface associated with the user identifier,” as amended claim 1 recites.

Kakuta additionally describes a means by which a user may “start [a] new thread.” *See Kakuta*, FIG. 5, item 305, FIG. 6, item 306, col. 8, ll. 12-29. The user may select one or more people in the list of people included in the messaging group to be associated with the new thread. *See id.*, FIG. 5. For example, by “clicking ‘Create’ displays a confirmation window” for creating a new thread between Jun-Jun, jormiya, and ohtsuka, Jun-Jun being “author of the thread.” *See id.*, FIG. 6, item 306, col. 8, ll. 16-19. As depicted in FIG. 5 of Kakuta, the new thread between Jun-Jun, jormiya, and ohtsuka may be displayed in a “message window 308.” *Id.*, FIG. 5, col. 8, l. 32. The message window illustrated in FIG. 5 of Kakuta includes a label “New Thread 1,” indicating that the new thread is a first newly generated thread. *Id.*, FIG. 5. The message window illustrated in FIG. 9 of Kakuta includes a label “New Thread” indicating that the thread is a newly generated thread. *Id.*, FIG. 9. However, neither the new thread nor the message window described in Kakuta discloses “caus[ing] rendering of first group-defined titles associated with the first plurality of communication channels to a first sidebar pane of a user interface associated with the user identifier,” as amended claim 1 recites. In fact, Kakuta is silent as to causing “rendering of first group-defined titles associated with . . . communication channels” and presenting them via “a first sidebar pane of a user interface,” as amended claim 1 recites.

Kakuta also describes a “situation in which a thread is created by selecting messages as a whole, or words included in messages.” *Kakuta*, col. 8, ll. 45-47. A thread created based on selected messages may include a combination of two or more threads associated with the list of the people included in the group chat. *See id.*, FIG. 10, col. 8, ll. 58-62. For example, the selection window 307 depicted in FIG. 10 of Kakuta includes “a list of threads created in the channel.” *Id.*, FIG. 10, col. 8, ll. 60, 61. The list of threads created in the channel may include any chat created among the list of people included in the “user window 302.” *See id.*, FIG. 10, item 307. However, presenting a list of threads created in a channel between a particular group of select people (users) as described in Kakuta, does not disclose “caus[ing] rendering of first group-defined titles

associated with the first plurality of communication channels to a first sidebar pane of a user interface associated with the user identifier,” as amended claim 1 recites. **Instead, Kakuta merely describes messaging threads associated with a particular communication channel between the designated people listed in the “user window 302.”**

Moreover, Kakuta fails to disclose “modify[ing] the first sidebar pane of the user interface to include the one or more communication channels,” as amended claim 1 recites. The user interface described in Kakuta includes “a main screen 301, a user window 302, and a chat window 303, and a message input field.” As discussed above, the user window 302 includes a list of people associated with the channel via which a messaging thread, such as that depicted in the chat window 303 may take place. As discussed above, Kakuta describes creating messaging threads between the list of people within the channel. However, at least because Kakuta describes messaging threads in a particular channel, the list of people in the user window 302 does not change throughout the disclosure. *See Kakuta*, FIGS. 5-10 and 12. As such, if the Office were relying on the user window 302 as allegedly disclosing the “sidebar pane” of claim 1, Kakuta is silent as to modifying the user window 302 and therefore, does not disclose “modify[ing] the first sidebar pane of the user interface to include the one or more communication channels,” as amended claim 1 recites.

Furthermore, Kakuta describes surfacing a “thread window 307” responsive to selection of an option on a “toolbar 305.” *Kakuta*, col. 8, ll. 13, 30. In one embodiment of Kakuta in which “Link” has been selected on the toolbar . . . [the thread window may include] a list of threads created in the channel.” *Id.*, col. 8, ll. 60, 61, FIG. 10. However, including a list of threads in a particular channel responsive to receiving a selection of a “link” option on a toolbar, as described in Kakuta, does not disclose “modify[ing] the first sidebar pane of the user interface to include the one or more communication channels,” as amended claim 1 recites.

For at least the reasons presented herein, Kakuta does not disclose all of the features of amended claim 1. Accordingly, Applicant submits that Kakuta does not anticipate claim 1, and respectfully requests that the Office withdraw the § 102 rejection of claim 1.

Dependent Claims 2, 4-7, and 9-12

Claims 2, 4-7, and 9-12 ultimately depend from independent claim 1. As discussed above, claim 1 is not anticipated by Kakuta, and is therefore allowable over the cited document. Therefore, claims 2, 4-7, and 9-12 are also allowable over the cited document of record for at least their dependency from an allowable base claim, and also for the additional features that each recites.

For example, claim 7, as amended herein, recites “receiv[ing] a user-defined channel label share confirmation from the second client device associated with the share recipient identifier,” and “in response to receiving the user-defined channel label share confirmation, cause storage of the user-defined channel label to a channel label repository associated with the share recipient identifier.” In the rejection of claim 7, the Office cites Kakuta, Figures 11(A) and 11(B), and Column 9, lines 5-22 as allegedly disclosing the limitations of claim 7. *Office Action*, pp. 5, 6. However, Kakuta merely describes a messaging interface in which “[p]articipants on a channel for example designate particular users, instructing the creation of a message group.” *Kakuta*, col. 2, ll. 17, 18. The system described in Kakuta then “send[s] th[e] messages out on the channel” to the designated users. *Id.*, col. 2, ll. 24, 25.

However, the generation of a messaging thread and designation of particular users to the thread without input from the particular users, as described in Kakuta, does not disclose receiving an acceptance or “user-defined channel label share confirmation from the second client device,” as amended claim 7 recites. In fact, Kakuta is silent as to “receiving a user-defined channel label share confirmation from the second client device associated with the share recipient identifier,” as amended claim 7 recites.

Furthermore, a particular user in a messaging group as described in Kakuta may link two or more message threads associated with the messaging group, to view the messages associated with the two or more threads in a single, linked thread. *See id.*, col. 8, ll. 62-65. The linked threads of Kakuta may be organized in one or more “administration tables.” *See id.*, col. 9, ll. 5-9. The administration tables described in Kakuta include information about the linked thread generated by a particular user (e.g., Jun-Jun). *See id.*, col. 9, ll. 5-22, FIGS. 11(A), 11(B). In the illustrative example of Kakuta, “Jun-Jun” links two messaging threads together to generate a third, “New-1”,

thread, also referred to as “Th3.” *Id.*, FIG. 11(A). “Accordingly, for user “Jun-Jun,” with whom there are linked users, a thread window is displayed in which messages in threads “Th1” and “Th2” are mixed.” *Id.*, col. 9, ll. 15-17. However, the linked message, or “Th3” generated by a particular user, as described in Kakuta, does not affect the displays for other users.” *Id.*, col. 9, ll. 17, 18.

In other words, a particular user in a messaging group may generate a linked thread, combining two or more messaging threads for view by the particular user. The view of the linked thread does not modify a display or messaging thread organization for other users in the messaging group. At least because Kakuta describes a way in which a user may modify their display, not affecting a view by others, Kakuta does not describe “receiv[ing] a user defined channel label share confirmation from the second client device associated with the share recipient identifier,” and “in response to receiving the user-defined channel label share confirmation, cause storage of the user-defined channel label to a channel label repository associated with the share recipient identifier,” as claim 7 recites.

Accordingly, Applicant respectfully requests that the Office withdraw the § 102 rejection of claim 2, 4-7, and 9-12.

Independent Claim 14

Claim 14, as amended herein, recites, in part:

...
receiving a user identifier;
accessing a first plurality of communication channels of the communication channels based on the user identifier;
causing rendering of first group-defined titles associated with the first plurality of communication channels to a first sidebar pane of a user interface associated with the user identifier;
receiving, from a first client device associated with the user identifier, a request to view one or more communication channels of the first plurality of communication channels that are associated with a user-defined channel label;
identifying the one or more communication channels associated with the user-defined channel label based on the request; and
causing rendering of the one or more communication channels to the first sidebar pane of the user interface based on the request.

Applicant describes Kakuta above. To the extent that claims 1 and 14 recite similar subject matter, for at least reasons similar to those discussed above with regard to claim 1, Kakuta does not disclose all of the features of claim 14. Accordingly, Kakuta does not anticipate claim 14.

Accordingly, Applicant respectfully requests that the Office withdraw the § 102 rejection of claim 14.

Dependent Claims 15, 17-20, and 22-25

Claims 15, 17-20, and 22-25 ultimately depend from independent claim 14. As discussed above, claim 14 is not anticipated by Kakuta, and is therefore allowable over the cited document. Therefore, claims 15, 17-20, and 22-25 are also allowable over the cited document of record for at least their dependency from an allowable base claim, and also for the additional features that each recites.

Accordingly, Applicant respectfully requests that the Office withdraw the § 102 rejection of claim 15, 17-20, and 22-25.

NEW CLAIM 55 IS ALLOWABLE OVER KAKUTA

Applicant herein adds new claim 55. The new claim is supported by the specification, as originally filed, at least at paragraphs [0068], [0069], and [00117]-[00136] and the associated figures. New claim 55 does not introduce new subject matter.

Independent claim 55 includes subject matter similar to that recited in claim 1. As discussed above, claim 1 is allowable over the cited documents of record. For at least similar reasons to those presented above with regard to claim 1, claim 55 is also allowable over the cited document.

Accordingly, Applicant respectfully requests that the Office examine and allow new claim 55.

CONCLUSION

For at least the foregoing reasons, all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and withdrawal of the rejections and a notice of allowance.

If any issue remains unresolved that would prevent allowance of this case, Applicant respectfully requests that the Office contact the undersigned attorney to resolve the issue.

Respectfully Submitted,

Lee & Hayes, P.C.
Representatives for Applicant

By: /Melissa J. Coombes Reg. No. 70096/ Dated: June 8, 2020

Melissa J. Coombes (melissa@leehayes.com)
Lee & Hayes, P.C.
Registration No. 70096

David A. Divine (daved@leehayes.com)
Lee & Hayes, P.C.
Registration No. 51275

Customer No. **169727**

Telephone: (509) 324-9256
Facsimile: (509) 323-8979
www.leehayes.com