

Filed: June 12, 2025

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AMAZON.COM, INC.,
Petitioner,

v.

VIRTAMOVE, CORP.,
Patent Owner.

IPR2025-00561
U.S. Patent No. 7,784,058

**PETITIONER'S OPPOSITION
TO DISCRETIONARY DENIAL BRIEF**

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1002	Declaration of Dr. Darrell Long
1003	David Ely et al., <i>Alpine: A User-Level Infrastructure for Network Protocol Development</i> , Proc. 3rd USENIX Symposium on Internet Technologies and Systems (USITS ’01) (2001) (“Ely”)
1004	Paul R. Eggert & D. Stott Parker, <i>File Systems in User Space</i> , Proc. USENIX Winter 1993 Conference (1993) (“Eggert”)
1005	John R. Levine, <i>Linkers & Loaders</i> (2000) (“Levine”)
1006	Chandramohan A. Thekkath, et al., <i>Implementing Network Protocols at User Level</i> , 23 ACM SIGCOMM Computer Comm. Rev., 64-73 (1993) (“Thekkath”)
1007	David Ely et al., <i>Alpine: A User-Level Infrastructure for Network Protocol Development</i> , 3rd USENIX Symposium on Internet Technologies and Systems (USITS ’01) (“Ely Presentation”)
1008	Excerpts from the ’058 patent’s file history
1009	Arindam Banerji et al., <i>Protected Shared Libraries – a New Approach to Modularity and Sharing</i> , Proc. USENIX Annual Technical Conf. (USENIX 1997) 59-75 (“Banerji”)
1010	Excerpts of UNIX System V Release 3 Programmer’s Guide
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1043	Excerpt of “Federal Court Management Statistics,” Administrative Office of the U.S. Courts (March 2025).
1044	Docket Report for <i>Jawbone Innovations LLC v. Amazon.com, Inc.</i> , Case No. 3:22-cv-06727-TLT (N.D. Cal.).

Exhibit No.	Description
1045	Proof of Service for Complaint Against Amazon
1046	Proof of Service for Complaint Against Google

I. INTRODUCTION

Patent Owner (“PO”) seeks discretionary denial here based on parallel Patent Office proceedings challenging the ’058 patent. (Paper 6.) But Petitioner (“Amazon”) was not involved in those parallel proceedings and has derived no strategic benefit from them. Thus, the parallel proceedings provide no basis for discretionary denial under *General Plastic Industrial Co., Ltd. v. Canon Kabushiki Kaisha*, IPR2016-01357 (PTAB Sept. 6, 2017) (Paper 19) or any other precedent.

Apart from the parallel proceedings, PO raises no other arguments for discretionary denial. For example, PO does not dispute that the ’058 patent’s examiner never considered the prior art in the Petition. (Paper 1 at 67.) PO does not dispute the Petition’s strong merits. (*Id.*) PO does not dispute that the co-pending district-court litigation has no operative schedule. (*Id.* at 66.) And PO never addresses the fact that the litigation is stayed (Ex. 1033), which means that no schedule or trial date will be set any time soon.

The circumstances here are ideal for achieving the efficiency benefits that Congress intended IPRs to provide. Thus, the Director should reject PO’s request for discretionary denial.

II. FACTUAL BACKGROUND

The Petition here is the first IPR petition filed by any party against the '058 patent. The Petition challenges claims 1-16 and 18 of the '058 patent. (Paper 1.) PO's argument for discretionary denial relies on three parallel proceedings: one *ex parte* reexamination requested by Unified Patents and two IPR petitions filed by Google. (Paper 6 at 1.) Amazon is not involved in any of those proceedings. Amazon is a defendant in co-pending district court litigation, but that litigation is stayed and will conclude long after any final written decision here.

A. Amazon Was Not Involved In Unified Patents' Reexamination Request.

Unified Patents filed its reexamination request several months before the Petition here. However, only two of the '058 patent's eighteen claims are at issue in the reexamination. (Ex. 1032 at Page 2.) Further, none of the prior art in the reexamination is at issue here. (*Compare id.* at Pages 5-6 with Paper 1 at 13.) The prior art presented here is materially stronger than the prior art in the reexamination. (Paper 1 at 67-68.)

Amazon did not participate in preparing or prosecuting Unified Patents' reexamination request. Nor did Amazon provide any direction or instructions to Unified Patents regarding that request. Nor did Amazon obtain any strategic benefit from the reexamination request. For example, Amazon did not have any opportunity to review the arguments and evidence that PO submitted in the

reexamination because Amazon filed the Petition here before PO filed its first office-action response there. (Paper 1 (filed Jan. 30); Ex. 1038 at 6 (filed Apr. 21).)

B. Amazon Was Not Involved In Google's IPR Petitions.

Google filed its two IPR petitions against the '058 patent on January 31, 2025. Case Nos. IPR2025-00489, -00490. Amazon had no part in Google's petitions. The prior art in Google's petitions does not overlap at all with the prior art relied on in Amazon's petition.

PO has asserted the '058 patent against both Google and Amazon, but the cases are in different courts. (Ex. 1034 at 1; Ex. 1035 at 1.) And Google's accused products are different from Amazon's accused products. (Ex. 1036, ¶ 24; Ex. 1037, ¶ 21.) PO does not allege that Google's infringement depends on Amazon. (*See generally* Ex. 1037.)

Although Google filed its IPR petitions the day after Amazon's filing here, this timing was not coordinated. The timing was driven by the service of PO's district-court complaints against Amazon and Google. PO served these complaints against Amazon and Google one day apart. (Ex. 1045; Ex. 1046.) Thus, the statutory deadlines for Amazon and Google under 35 U.S.C. § 315(b) were one day apart.¹

¹ Because these deadlines fell on a weekend (February 1-2, 2025), the statutory deadline moved to the following Monday under 35 U.S.C. § 21. Amazon filed its petition four days early and Google filed its petition three days early.

C. The Co-Pending District Court Litigation Against Amazon Is Stayed.

On January 26, 2024, PO sued Amazon in the U.S. District Court for the Western District of Texas. (Ex. 1036.) Amazon moved to transfer the case to the Northern District of California (“NDCA”). (Ex. 1019 at 1.) The magistrate judge granted Amazon’s transfer motion, but stayed the transfer for 30 days to allow time for PO to appeal to the district judge. (*Id.* at 6.)

On February 6, 2025, PO appealed the magistrate’s transfer order to the district judge by filing objections to the order. (Ex. 1039.) The magistrate judge then stayed the case for three additional months. (Ex. 1040.) On May 21, 2025, the district judge overruled PO’s objections to the transfer order. (Ex. 1041.) The district judge extended the stay again for another three months, giving PO an opportunity to seek a writ of mandamus from the Federal Circuit. (Ex. 1033.) PO subsequently sought a writ of mandamus in its case against Google, but has not done so thus far in its case against Amazon.

Absent a further stay, the district court will transfer the case against Amazon to NDCA on August 23, 2025. (*Id.*) After the transfer, the court in NDCA will set a new case schedule. N.D. Cal. Civ. L.R. 16-2(c).²

² Available at <https://cand.uscourts.gov/rules/civil-local-rules/>.

III. ANALYSIS

A. Google’s IPR Petitions Do Not Support Discretionary Denial.

The Board’s decision in *General Plastic*, IPR2016-01357 (Paper 19), sets forth a non-exhaustive list of factors that may be considered when deciding whether to allow multiple IPR petitions against the same patent. The *General Plastic* factors apply to determine whether a *later* petition should be denied in view of an *earlier* petition. *General Plastic*, Paper 19 at 8 (listing factors for “determining whether to exercise discretion under § 314(a) to deny a petition that challenges the same patent *as a previous petition*”) (emphasis added). But here, Amazon filed its IPR petition first. In these circumstances, the “roadmapping concerns that *General Plastic* seeks to alleviate” are absent. See *Peloton Interactive, Inc. v. NEC Corp.*, IPR2023-01241, Paper 17 at 16 (PTAB Feb. 7, 2024); *Cisco Sys., Inc. v. Lionra Techs. Ltd.*, IPR2023-00670, Paper 10 at 18-19 (P.T.A.B. Oct. 23, 2023). Thus, discretionary denial of Amazon’s IPR petition in view of Google’s later-filed IPR petitions is unwarranted.

B. Unified Patents’ Reexamination Request Does Not Support Discretionary Denial.

The Board has repeatedly declined to extend the *General Plastic* factors to support discretionary denial based on prior requests for *ex parte* reexamination. *Tesla, Inc. v. Graphite Charging Company LLC*, IPR2024-00388, Paper 15, 6-8 (Aug. 27, 2024). Instead of applying *General Plastic*, the Board has considered

whether an earlier-filed reexamination request involves “the same or substantially the same prior art or arguments” as a later-filed IPR petition. *E.g., Samsung Elecs. Co., Ltd. v. Maxell, Ltd.*, No. IPR2024-00907, 2024 WL 5079910, at *5 (P.T.A.B. Dec. 11, 2024). Under that test, discretionary denial is not warranted here because PO does not argue that any of the prior art or arguments in the Petition overlap with the reexamination request.

PO speculates that Unified Patents filed the reexamination request “on behalf” of Amazon. (Paper 6 at 1.) It did not. Amazon was not involved in Unified Patent’s decision to file the reexamination request, the selection of prior art, the claims to challenge, or any other decision about the reexamination request. Indeed, Amazon’s lack of involvement is apparent from the reexamination request itself because it challenges only one claim that is asserted against Amazon. (Ex. 1031 at 1 (challenging claim 1); Ex. 1027 at 7 & n.2 (listing asserted claims).) The other claim challenged in the reexamination is *not* asserted against Amazon. (Ex. 1031 at 1 (claim 12).) And the reexamination fails to challenge six out of the seven claims that *are* asserted against Amazon. (*Id.*) If Unified Patents had filed the reexamination request on Amazon’s behalf, it would have challenged the claims that PO asserts against Amazon.

The reexamination provides no basis for discretionary denial here at least because: (1) Amazon was not involved in the reexamination; (2) the reexamination

involves only two of the '058 patent's eighteen claims; (3) the prior art in the reexamination is materially different from the prior art here; and (4) Amazon obtained no strategic benefit from the reexamination request. (*Supra*, p. 5.) Thus, PO's reliance on the reexamination request is misplaced. *See Samsung Elecs. Co., Ltd. v. Maxell, Ltd.*, No. IPR2024-00907, 2024 WL 5079910, at *5 (P.T.A.B. Dec. 11, 2024) (prior reexamination did not support discretionary denial); *see also Twitch Interactive, Inc. v. Razdog Holdings LLC*, IPR2025-00307, Paper 18 at 2-3 (P.T.A.B. May 16, 2025) (pending reexamination of related patent did not support discretionary denial).

C. PO's "Power Imbalance" Argument Is Unfounded.

PO argues that discretionary denial is warranted based on a "power imbalance" between itself and Amazon. (Paper 6 at 1.) To the extent that PO's alleged "power imbalance" refers to the financial burden that multiple parallel IPRs may impose on a smaller company, that argument lacks merit under the circumstances here. PO elected to simultaneously pursue lawsuits against Amazon, Google, Hewlett Packard Enterprise, IBM, Microsoft, and Oracle, in three different district courts. (Paper 3 at 1-2.) Such litigation campaigns are routinely financed by deep-pocketed litigation funders, who provide billions of dollars in funding to patent plaintiffs. (*E.g.*, Ex. 1042 at 1.) Tellingly, PO never claims to be paying its own legal expenses, and PO's decision to sue six major

technology companies at once makes it highly likely that a third-party funder with no shortage of resources is inciting the litigation campaign.

Regardless of PO's funding source, the expense of multiple IPR proceedings does not support discretionary denial here because (1) it is a fraction of the cost PO would have budgeted for the co-pending district court proceedings and (2) it is a foreseeable consequence of PO's own decision to sue six companies at once. The Director should not immunize an invalid patent from meritorious IPR petitions merely because the patentee has elected to simultaneously sue multiple defendants.

D. Google Does Not Represent Amazon's Interest.

PO further argues that discretionary denial is warranted because "both Amazon and Google's interests can be represented by a single Petition challenging validity." (Paper 6 at 2.) The Director should reject this argument because it is conclusory, unsupported by any evidence, and contrary to precedent.

Amazon and Google are vigorous competitors. Amazon had no role in Google's IPR petitions. Amazon and Google each filed IPR petitions against the '058 patent simply because PO asserted the patent against both of them—in separate cases involving separate sets of accused products. (*Supra*, p. 3.) Thus, PO's allegations of a "coordinated attack" (Paper 6 at 1-2) are baseless.

Two petitioners who are simply defending themselves in litigation against the same patent do not have any "significant relationship" that would warrant dis-

cretionary denial. *Ford Motor Co. v. Neo Wireless LLC*, IPR2023-00763, Paper 28, 7, 10 (Mar. 22, 2024) (director review); *Facebook, Inc. v. Express Mobile Inc.*, IPR2021-01457, Paper 10, 11-12 (Mar. 18, 2022); *Videndum Production Sols., Inc. v. Rotolight Ltd.*, IPR2023-01218, Paper 12, 7 (Apr. 19, 2024) (director review). A patent owner who chooses to simultaneously sue many companies at once is not unfairly prejudiced when each company defends itself in the most efficient forum.

E. Instituting This IPR Will Be More Efficient Than Waiting for Any Trial That May Eventually Be Scheduled in District Court.

The district-court case is currently stayed and has no operative schedule or trial date. (*Supra*, pp. 4-5.) A schedule will be set only after the case is transferred to NDCA, no earlier than August 23, 2025. (*Id.*) This weighs against discretionary denial. And, the NDCA’s median time-to-trial statistics suggest that any trial that is scheduled following the transfer would begin no earlier than 2028—long after the projected final written decision in this case. (Ex. 1043; *see also* Paper 5 (Notice of Filing Date Accorded).)³ These facts weigh in favor of proceeding with this IPR. *Twitch*, Paper 18 at 2-3; *Amazon.com, Inc. v. NL Giken Inc.*, IPR2025-00250, Paper 14 at 2 (P.T.A.B. May 16, 2025).

³ This timeline for trial in the district court is consistent with Amazon’s experience in another case transferred to the NDCA, where the judge set a trial date approximately 30 months after transfer. (Ex. 1044 at Dkt. Nos. 61, 96.)

Further, as the Director has recognized, if the Board institutes this IPR, then the district court in NDCA is likely to stay the litigation pending completion of the IPR. *Twitch*, Paper 18 at 2-3; *see also, e.g., Largan Precision Co., Ltd. v. Motorola Mobility LLC*, No. 21-cv-09138, 2022 WL 2954935, at *2 (N.D. Cal. Jul. 26, 2022); *Zomm, LLC v. Apple Inc.*, 391 F. Supp. 3d 946, 956 (N.D. Cal. 2019); *Finjan, Inc. v. FireEye, Inc.*, No. 13-cv-03133, 2014 WL 2465267, at *1 (N.D. Cal. June 2, 2014). Such stays are routinely granted in NDCA, even when IPRs are instituted for only a subset of the asserted patents. *E.g., Google LLC v. EcoFactor, Inc.*, No. 21-cv-03220-HSG, 2022 WL 6837715 (N.D. Cal. Oct. 11, 2022); *HD Silicon Sols. LLC v. Microchip Tech. Inc.*, No. 21-cv-08295-SK, 2022 WL 3084315 (N.D. Cal. Aug. 3, 2022); *Netflix, Inc. v. CA, Inc.*, No. 21-cv-03649-EMC, 2022 WL 1144631 (N.D. Cal. Mar. 30, 2022); *WSOU Invs. LLC v. Juniper Networks Inc.*, No. 21-cv-07557-BLF, 2022 WL 19709 (N.D. Cal. Jan. 3, 2022); *Neodron, Ltd. v. Lenovo Grp., Ltd.*, No. 19-cv-05644, 2020 WL 5074308 (N.D. Cal. Aug. 27, 2020).

If the Board institutes this IPR, the final written decision will be due in 2026. (Paper 5.) As explained above, this will be much faster than waiting for a trial in the district court, with or without a further stay. Thus, the circumstances here are ideal for achieving the efficiency benefits that Congress designed IPRs to provide. *See* H.R. Rep. No. 112-98, at 39-40 (2011) (IPRs were designed to pro-

vide “a more efficient system for challenging patents that should not have issued” and to reduce “unwarranted litigation costs”); *see also Twitch*, Paper 18 at 2-3; *Amazon.com, Inc.*, Paper 14 at 2.

IV. CONCLUSION

The Director should reject PO’s request for discretionary denial and allow the Board to proceed to the merits of this IPR.

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June 12, 2025

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CERTIFICATE OF COMPLIANCE

Pursuant to 37 C.F.R. §42.24(d), the undersigned certifies that this **PETITIONER’S OPPOSITION TO DISCRETIONARY DENIAL BRIEF** contains 2,354 words according to the word-processing program used to prepare this paper excluding the portions exempted under 37 C.F.R. §42.24(a)(1).

June 12, 2025

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PETITIONER'S OPPOSITION TO DISCRETIONARY DENIAL BRIEF** is being served on June 12, 2025, via e-mail on counsel of record for Patent Owner at the address below:

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