# INTRODUCTION

U.S. Patent No. 7,010,508 ("the '508 Patent"; Ex. 1007) issued March 7, 2006 and is assigned to Landmark Technologies LLC ("Landmark"). Each of claims 1-17 of the '508 Patent is unpatentable for two independent reasons. First, the specification of the '508 Patent fails to disclose a structure for many of the means-plus-function elements in the claims. Second, every element of each of those claims was known in the prior art, including the use of so-called "forwardchaining" – the alleged inventive feature of the '508 Patent.

Each of the '508 Patent's claims is unpatentable for failure to comply with 35 U.S.C. § 112 ¶ 2 and 6. A claim element governed by § 112 ¶ 6 is indefinite if the specification does not disclose its corresponding structure(s). Aristocrat Techs. Austl. Pty Ltd. v. Int'l Game Tech., 521 F.3d 1328, 1338 (Fed. Cir. 2008).[1] To disclose structure for a § 112 ¶ 6 element consisting of a function performed on a programmed, general-purpose computer, the specification must teach the algorithm that performs that function. Id. Each claim of the '508 Patent recites means to perform various functions on a programmed, general-purpose computer, for which Petition for Post-Grant Review of U.S. Patent No. 7,010,508 the '508 Patent fails to teach any corresponding algorithm. Thus, claims 1-17 are indefinite and therefore unpatentable.

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[1]The '508 Patent is subject to pre-AIA patentability rules because all claims of the '508 Patent were filed prior to March 16, 2013.