

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GEN DIGITAL INC.,

Petitioner

v.

KAJEET, INC.,

Patent Owner

U.S. Patent No. 8,667,559

Inter Partes Review Case No.: IPR2022-00001

**PATENT OWNER'S
REPLY IN SUPPORT OF
REVISED CONTINGENT MOTION TO AMEND**

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EXHIBIT LIST

Exhibit	Description
2001	Declaration of Corby R. Vowell
2002	Declaration of Chetan Sharma (with CV attached) [Dkt. 35-2] filed in <i>Kajeet, Inc. v. Trend Micro, Inc.</i> , Case No. 6:21-CV-00389-ADA, filed in the U.S. District Court for the Western District of Texas on December 3, 2021
2003	Order Denying Motion to Transfer [Dkt. 43] in <i>Kajeet, Inc. v. Trend Micro, Inc.</i> , Case No. 6:21-CV-00389-ADA, filed in the U.S. District Court for the Western District of Texas on January 12, 2022
2004	Order Setting Markman Hearing [Dkt. 39] in <i>Kajeet, Inc. v. Trend Micro, Inc.</i> , Case No. 6:21-CV-00389-ADA, filed in the U.S. District Court for the Western District of Texas on January 4, 2022
2005	Excerpt from File History of U.S. Patent Application Ser. No. 13/786,760 (Office Action dated July 17, 2013)
2006	Patent Application Publication 2006/0025139 (“Bales”)
2007	Excerpt from File History of U.S. Patent Application Ser. No. 13/786,760 (Notice of Allowance was entered on December 18, 2013)
2008	Joint Claim Construction Pre-Hearing Statement (Dkt. 44) in <i>Kajeet, Inc. v. Trend Micro, Inc.</i> , Case No. 6:21-CV-00389-ADA, filed in the U.S. District Court for the Western District of Texas on January 13, 2022.
2009	U.S. Patent No. 7,899,438
2010	U.S. Patent Application No. 13/786,730 as filed March 6, 2013.
2011	U.S. Patent Application No. 13/763,348 as filed February 8, 2013.
2012	U.S. Patent Application No. 13/603,218 as filed September 4, 2012.

Exhibit	Description
2013	U.S. Patent Application No. 12/950,379 as filed November 19, 2010.
2014	U.S. Patent Application No. 11/881,460 as filed July 26, 2007.
2015	Declaration of Chetan Sharma
2016	U.S. Patent No. 8,706,079
2017	Defendant NortonLifeLock, Inc.'s First Set of Interrogatories to Plaintiff Kajeet, Inc. in <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2018	Defendant NortonLifeLock, Inc.'s First Set of Requests for Admissions to Plaintiff Kajeet, Inc. in <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2019	Defendant NortonLifeLock, Inc.'s Rule 45 Subpoena to Dr. Charles K. Knutson in <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2020	NortonLifeLock, Inc.'s Invalidity Contentions served on September 30, 2021 in <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2021	Kajeet, Inc.'s Response to Petition for Writ of Mandamus filed in In re Trend Micro, Inc., Case No. 22-133
2022	Docket Report for <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN, accessed from PACER ECF system on March 28, 2022.
2023	Final Invalidity Contentions served on March 21, 2022 in <i>Kajeet, Inc. v. Trend Micro, Inc.</i> , Case No. 6:21-cv-00389-ADA
2024	E-mail Correspondence from Richard A. Wojcio, Jr. transmitted on March 21, 2022 regarding <i>Kajeet, Inc. v. Trend Micro, Inc.</i> , Case No. 6:21-cv-00389-ADA.
2025	NortonLifeLock, Inc.'s draft Petition for Inter Partes Review of U.S. Patent 8,667,559 (undated) received on February 10, 2021.

Exhibit	Description
2026	First Set of Common Interrogatories to Plaintiff Kajeet, Inc. in <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2027	First Set of Common Requests for Production to Plaintiff Kajeet, Inc. in <i>Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2028	Defendant NortonLifeLock, Inc.’s First Set of Requests for Production to Plaintiff <i>Kajeet, Inc. in Kajeet, Inc. v. NortonLifeLock, Inc.</i> , Case No 1:20-cv-01339-MN
2029	Declaration of Stuart Lipoff in support of Revised Contingent Motion to Amend
2030	Stuart Lipoff CV
2031	Doug Twilleager et al., <i>Java Technologies for Games</i> , ACM Computers in Entertainment, Volume 2, Number 2, April 2004, Article 8.
2032	Declaration of Jason Hoffman in support of Patent Owner’s Motion for <i>Pro Hac Vice</i> Admission
2033	March 26, 2021 Protective Order in <i>Kajeet, Inc. v. NortonLifeLock Inc.</i> , No. 1:20-cv-1339 (D. Del.), Dkt. 36
2034	Chetan Sharma’s March 31, 2021 Executed Undertaking of the March 26, 2021 Protective Order in <i>Kajeet, Inc. v. NortonLifeLock Inc.</i>
2035	April 1, 2021 Email from Rich Wojcio to Charanjit Brahma, Manish Mehta, and Christina Almandarez enclosing Chetan Sharma’s March 31, 2021 Executed Undertaking of the March 26, 2021 Protective Order in <i>Kajeet, Inc. v. NortonLifeLock Inc.</i>

I. INTRODUCTION

Patent Owner, Kajeet, Inc., respectfully submits this reply to Petitioner's Opposition to Patent Owner's Revised Contingent Motion to Amend, Paper 43.

II. SUBSTITUTE CLAIMS AT ISSUE

In its revised motion, Patent Owner moved the Board to amend claims 1-2, 5-12, and 27-29 in the event that the Board finds grounds to cancel those claims from U.S. Patent No. 8,667,559 (the "'559 Patent"). Patent Owner submitted substitute claims 31-32 and 35-45, which replace the challenged claims on a one-for-one basis. As correctly identified by Petitioner, Patent Owner inadvertently included substitute claims 33, 34, and 46 in its revised motion. Patent Owner formally withdraws substitute claims 33, 34, and 46. A corrected Appendix of claims is enclosed.

III. THE AMENDMENTS ARE SUPPORTED BY THE WRITTEN DISCLOSURE OF THE '559 PATENT

Contrary to Petitioner's contentions, Patent Owner relies upon the specification from the '559 Patent to demonstrate that the amendments are supported by adequate written description. *See* Ex. 1001 at 9:3-11 (a user device "communicate[s] with the PDP to determine if a policy is in place that would prevent use of the feature or function for some reason, such as the wrong time of the day [or] time limit set on the game."); *see also id.* at 11:13-17 & 12:10-12. Patent Owner properly provided an expert declaration from Mr. Lipoff in support of its revised motion to amend to demonstrate that the written description requirement has been

met. *See Fleming v. Cirrus Design Corp.*, 28 F.4th 1214, 1225 (Fed. Cir. 2022) (“A claim has met the written description requirement of 35 U.S.C. § 112 if it ‘clearly allow[s] persons of ordinary skill in the art to recognize that the inventor invented what is claimed.’ Said otherwise, the application's disclosure must ‘reasonably convey[] to those skilled in the art that the inventor had possession of the claimed subject matter as of the filing date.’”) (cleaned up). Petitioner does not dispute that Mr. Lipoff is one skilled in the art. And Mr. Lipoff explained how the written description conveys possession of the substitute claims. *See* Ex. 2029 ¶¶ 38-53.

Specifically, Mr. Lipoff identified both a primary and a secondary embodiment disclosed in the specification. *Id.* ¶ 47. Mr. Lipoff pointed to Figure 2 as encompassing the primary embodiment. *Id.* ¶ 45. And, in describing the second embodiment, which is the topic of the substitute claims, he annotated Figure 2 to show how the enforcement function described in the specification takes place within the mobile station. *Id.* ¶ 47 (“An example of this second embodiment is illustrated *in the annotation of the '559 patent Fig. 2* that shows that the enforcement function in this second embodiment takes place within the mobile station without involvement of the Fig. 2 PEP item 28.”) (emphasis added). In doing so, Mr. Lipoff demonstrated how the disclosure in the specification (Ex. 1001 at 9:3-11) reasonably conveyed to one skilled in the art that the inventors were in possession of the subject matter of the substitute claims. Mr. Lipoff and Patent Owner did not, as Petitioner

contends, “rel[y] on a doctored version of Figure 2.” Paper 43 at 4.

Notably, Petitioner decided not to depose Mr. Lipoff or to submit an expert declaration responding to Mr. Lipoff’s declaration. Rather, in its opposition, Petitioner chose to attack deposition testimony of Patent Owner’s other expert Mr. Sharma. *See* Paper 43 at 1, 7, 8, 10, 11, 19, & 24. But Mr. Sharma was barred from participating in any amendment with respect to this IPR.

As an expert in the related district court case, Mr. Sharma is subject to a protective order that prevents him “from influencing the drafting or amending of the claims of any existing or future patent so that the patents read on the Producing Party’s past, present, or future products resulting in a parallel proceeding at PTAB.”¹ Petitioner was and is acutely aware of this restriction; counsel for Petitioner received a copy of Mr. Sharma’s undertaking.² At his deposition, Petitioner’s counsel acknowledged the existence of the protective order (Ex. 1017 at 84:11-23) and confirmed with Mr. Sharma that he was not involved with the original motion to

¹ *See* Ex. 2033 (*Kajeet, Inc. v. NortonLifeLock Inc.*, No. 1:20-cv-1339 (D. Del.), Dkt. 36 (March 26, 2021 Protective Order)) at 11; Ex. 2034 (Mr. Sharma’s March 31, 2021 Executed Undertaking of the March 26, 2021 Protective Order).

² *See* Ex. 2035 (April 1, 2021 email to Charanjit Brahma, Manish Mehta, and Christina Almandarez enclosing Mr. Sharma’s undertaking).

amend and that he had not offered any opinions relating to it. *See* Ex. 1017 at 85:6-12 (“Q. And I take it you did not work on the amended claims? A. No. Q. And your declaration does not opine on the validity or anything else with respect to the amended claims; correct? A. No.”). And yet, Petitioner’s opposition quotes the deposition of Mr. Sharma, even though Mr. Sharma had not offered, was not prepared to offer, and was not permitted to offer any opinions on the original motion to amend. While Mr. Sharma’s testimony is relevant to claims 1-2, 5-12, or 27-29, based upon the restrictions of the protective order, Mr. Sharma’s testimony is not relevant to Patent Owner’s revised motion to amend.³ Petitioner should not be permitted to use the protective order both as a shield that prevents Mr. Sharma from giving any opinions supporting a motion to amend and as a sword that allows Petitioner to attack the motion to amend with the elicited testimony.⁴

³ Patent Owner has further discussed the applicability of Mr. Sharma’s testimony to claims 1-2, 5-12, and 27-29 in its Sur Reply. *See* Paper 38 at 5-6 & 10-11.

⁴ Mr. Sharma did not make the admissions that Petitioner suggests. *See* Paper 43 at 10 (citing Ex. 1017 at 68:9-21). Petitioner directed Mr. Sharma to column 8, lines 40-47 of the specification (*see* Ex. 1017 at 67:25-68:8) when answering questions about the location of the PEP. *See* Ex. 1017 at 68:9-21. He was not directed to column 9, where the specification provides written description of the substitute

Petitioner’s argument, that its expert’s admission that enforcement can occur on the user’s device is “pure fiction” (Paper 43 at 11), is belied by the expert’s declaration, which states: “Moreover, to the extent Kajeet’s argument is credited, the one lone disclosure (excerpted above) at most *suggests* that enforcement occurs on a user level device only for the use of features or functions on the user-level device.” Ex. 1016 ¶ 168 (emphasis added). Petitioner’s expert refers here to the same specification disclosure on which Patent Owner and Mr. Lipoff rely, which refers to enforcement on the mobile device. And Petitioner fails to respond to Mr. Lipoff’s discussion of Twilleager, which provides context for why a POSITA “would recognize that a game, installed on a mobile device in 2007, would have features and functions for which a communication request would need to be to a remote device.” Ex. 2029 ¶ 50. Therefore, a POSITA in 2007, when reading the application for the ’559 Patent, would understand the application to disclose that the games on a user’s computing device request communications with remote devices and that the user’s computing device could enforce a policy decision from the PDP. *See* Ex. 2029 ¶ 52.

claims, which includes disclosing an embodiment with the PEP on the user’s computing device. *See* Ex. 1001 at 9:3-11; Ex. 2029 ¶ 47.

IV. THE SUBSTITUTE CLAIMS ARE DEFINITE AND PATENTABLE

Both substitute claims 31 and 43 claim “a user’s computing device,” and both claims refer back to that user’s computing device as “the computing device.” In fact, the preamble of each claim, which introduces only a “user’s computing device,” contains a specific reference back to the “user’s computing device” as “the computing device.” *See* Claim 31 (“A non-transitory computer readable storage medium comprising instructions that, when executed on a user’s computing device . . . cause the computing device to at least:”); Claim 43 (“A method for controlling a user’s computing device . . . , the method comprising, at the computing device:”). Claims 31 and 43 contain additional references to “the computing device,” which all refer back to same antecedent basis: “a user’s computing device.” There is no confusion to a person of ordinary skill of the art or the public in general that the antecedent basis for “the computing device” is “a user’s computing device.”

Nor, as Petitioner alleges, is there confusion whether “the computing device” could also point to “the ‘remote computing device,’ or some other computing device.” Paper 43 at 12. The substitute claims present the “user computing device” as distinct from the “remote computing device” in clear, straightforward language. The “user’s computing device” performs the sending, receiving and enforcing operations recited by Claims 31 and 43. *See* Claims 31 & 43. On the other hand, the “remote computing device” is the subject of the request to communicate that the

user computing device “send[s] to a server,” and the “requested communication is to be between the computing device and the remote computing device.” *Id.* These recitations provide context that identify the “user computing device” and the “remote computing device” as distinct from each other. *See Energizer Holdings, Inc. v. Int’l Trade Comm’n*, 435 F.3d 1366, 1370 (Fed. Cir. 2006) (“Whether [a] claim, despite lack of explicit antecedent basis . . . nonetheless has a reasonably ascertainable meaning must be decided in context.”).

V. THE SUBSTITUTE CLAIMS ARE NOT OBVIOUS

A. The Substitute Claims Are Not Obvious Over Putzolu Considered Alone

In its opposition, Petitioner fails to respond to any of the three points raised by Patent Owner regarding Putzolu. First, the Request Queries in Putzolu are requests for allocation of resources, such as bandwidth, from the network (*see* Ex. 1005 at 4:32-41; Ex. 2029 ¶ 57), rather than “a request to communicate with a remote computing device over the communication network,” as required by the substitute claims. And in Petitioner’s opposition, Petitioner is silent regarding whether in fact the Request Queries are only requests for allocation of resources. *See* Paper 43 at 21-23. Second, Putzolu’s policy server’s responses to those Request Queries include the policy objects, which is inconsistent with the claims’ requirement that “requested communication be[] enabled or disabled without accessing the one or more policies by the computing device.” *See* Ex. 2029 ¶ 60. Again, Petitioner’s opposition is

silent on this point. *See* Paper 43 at 21-23. Third, Petitioner’s opposition is silent regarding the fact that Putzolu is directed to the allocation of resources for a network user, and would not be relevant to solving the problems addressed by the ‘559 Patent of the “establishment and enforcement of policies or rules associated with features or functions that may be performed with the device.” Ex. 2010 at 28 (Abstract); Ex. 2029 ¶ 56.

B. The Substitute Claims Are Not Obvious Over Putzolu and Rothman

In its opposition, Petitioner fails to respond to any of the three points raised by Patent Owner regarding Putzolu and Rothman. First, Patent Owner explained that there would be no motivation to place Putzolu’s policy client 22 on Rothman’s mobile phone because Putzolu teaches to place policy clients 22 at devices that are “responsible for data forwarding,” (Ex. 1005 at 3:29-31; *see also* Ex. 2029 ¶ 73), and mobile phones are not these kinds of devices. *See* Ex. 2029 ¶ 73. Petitioner’s opposition fails to respond to this argument. *See* Paper 43 at 23-25. Second, Patent Owner explained that (1) Putzolu’s policy client 22 sends a Request Query to a policy server 18, which is not “a request to communicate with a remote computing device” and, (2) under Petitioner’s modification, Rothman’s user device would send the same Request Query to a policy server 18, which would not be a “request to communicate with a remote computing device,” as claimed. *See* Ex. 2029 ¶ 73. Again, Petitioner’s opposition provides no response to this argument. *See* Paper 43

at 23-35. Third, Patent Owner argued that (1) Rothman’s techniques do not apply to requests to communicate with remote devices because in Rothman, permissions are broadcast by the network rather than being responsive to requests (*see* Ex. 2029 ¶ 71); (2) Rothman is directed to enabling/disabling phone features such as cameras when predetermined trigger operations occur (Ex. 1007 at 2:18-25; Ex. 2029 ¶ 71); (3) “normal phone operation ... can occur while the phone waits for the trigger to occur” (Ex. 1007 at 3:57-60); and (4) that this operation—maintaining normal phone operation—is inconsistent with Putzolu’s technique to reserve network resources before they are needed, and it is inconsistent with the substitute claims, which send requests to communicate to a server for grant or denial. *See* Ex. 2029 ¶ 72. Again, Petitioner provides no response to this argument in its opposition. *See* Paper 43 at 23-35.⁵

VI. THE SUBSTITUTE CLAIMS RECITE PATENT-ELIGIBLE SUBJECT MATTER

As Patent Owner stated in its revised motion to amend, the substitute claims provide an improvement to computer functionality: controlling user access to communication functions of the user’s device that are secure against user tampering. The solution provides a highly flexible, but secure means for enforcement of policies associated with the communication functions that may be performed with the device,

⁵ Petitioner has dropped the obvious combination of Putzolu and Choudhary.

because the policies are not accessed by the user device. *See* Ex. 2029 ¶ 75.

First, Petitioner’s opposition attempts to distinguish *Bascom Global Internet Svcs. v. AT&T Mobility LLC*, 827 F.3d 1341, 1350-1352 (Fed. Cir. 2016) not on the substance of the opinion—which reversed a finding of invalidity under Section 101—but that “[t]his matter lies in an entirely different procedural posture.” Paper 43 at 15. The procedural posture—that *Bascom* was decided on an appeal of a Rule 12(b)(6) motion to dismiss—is immaterial. In fact, the MPEP cites *Bascom* no fewer than 18 times in MPEP § 2106 regarding “Patent Subject Matter Eligibility.” *See e.g.* MPEP § 2106.06(b) (“Although the Federal Circuit held [the *Bascom*] claims eligible at Step 2B (Pathway C) because they presented a ‘technology-based solution’ of filtering content on the Internet that overcame the disadvantages of prior art filtering systems and that amounted to significantly more than the recited abstract idea, it also would be reasonable for an examiner to have found these claims eligible at Pathway A or B if the examiner had considered the technology-based solution to be an improvement to computer functionality.”). The substitute claims are similar to those of *Bascom*, which determined that claims to Internet filtering tool were patent-eligible because they recite control features at a “specific location, remote from the end-users, with customizable filtering features specific to each end user,” and they do not preempt all Internet filtering techniques. And Petitioner has failed to distinguish *Bascom* based on the actual substance of the opinion.

Second, Petitioner argues that *ChargePoint, Inc. v. SemaConnect, Inc.*, 920 F.3d 759, 775 (Fed. Cir. 2019) has “parallel facts.” *See* Paper 43 at 16.⁶ But the claims involved in *ChargePoint* are very different than the substitute claims. The *ChargePoint* claims were directed to communication over a network to interact with a charging station for electric vehicles; responsive to the communication, a controller merely “turn[ed] electric supply on and off to enable charge transfer.” *Id.* at 765. Here, the substitute claims provide policy controls to requested communications in which “decision[s] granting or denying the request” are made by one device (a server), and the decisions are “enforc[ed]” by another device (a user’s computing device) “by enabling the requested communication . . . without accessing the one or more policies.” The substitute claims provide a highly flexible, dynamic, and fine-grained solution for enforcement of policies associated with the communication functions that may be performed with the device, and that the policies are not under the control of the user. The substitute claims have far more specificity than those of *ChargePoint*.

Third, Petitioner states that “it is well-established that merely moving policies” is not an inventive concept citing *Amazon.com, Inc. v. Uniloc Luxembourg*

⁶ Notably, *ChargePoint* was decided in the same procedural posture as *Bascom*—the Federal Circuit affirmed the invalidity of claims on a Rule 12(b)(6) motion.

S.A., IPR2017-00948, Paper 31 at 62-63 (PTAB Aug. 1, 2018). Petitioner’s argument oversimplifies the substitute claims; they require that policies are “enforc[ed]” but not “access[ed]” by the user computing device. Petitioner’s argument also mischaracterizes the *Amazon.com* claims, which were deemed abstract because they relate to a time-adjustable license and, therefore, resembled “other financial, business, and contractual practices found by the [courts] to be abstract.” *Amazon.com* at 60. The present amendment presents claims that have very different character than those of *Amazon.com*.

Fourth, Petitioner asserts that “Mr. Lipoff concedes that the benefits supposed conferred by the revised substitute claims . . . [are] equally found in Putzolu . . . [a]nd Mr. Lipoff notably does not . . . address Choudhary.” Paper 43 at 19. Mr. Lipoff has made no concession regarding Putzolu; nor does Petitioner actually cite to one. Moreover, Mr. Lipoff specifically addresses Choudhary and concluded that Choudhary (in conjunction with Putzolu) does not invalidate the substitute claims. *See* Ex. 2029 ¶¶ 62-68. Petitioner’s expert only states that Choudhary teaches that “policies” were well known in the art; no more. Ex. 1016 ¶ 204. Petitioner now has dropped its argument that Choudhary somehow invalidates the substitute claims.

VII. CONCLUSION

For the foregoing reasons, Patent Owner requests the Board, on a contingent basis, to amend claims 1-2, 5-12, and 27-29 with substitute claims 31-32 and 35-45.

Respectfully submitted,

Date: January 26, 2023

/ Robert L. Hails /

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APPENDIX

Proposed to replace claim 1:

31. A non-transitory computer readable storage medium comprising instructions that, when executed on a user's computing device configured to perform a function on a communication network managed by a service provider, cause the computing device to at least:

send to a server a request to communicate with a remote computing device over the communication network, **wherein the requested communication is to be between the computing device and the remote computing device;**

receive in real-time from the server a response indicative of a decision granting or denying the request, the decision being based on one or more policies that are stored at the server and based at least in part on input from an administrator; and

enforce the response by enabling the requested communication with the remote computing device over the communication network when the decision grants the request and by disabling the requested communication when the response denies the request, the requested communication being enabled or disabled without accessing the one or more policies by the computing device.

Proposed to replace claim 2:

32. The non-transitory computer readable storage medium of claim 31, wherein the computing device is a mobile phone.

Proposed to replace claim 5:

35. The non-transitory computer readable storage medium of claim 31, wherein the communication comprises one or more of voice calling, messaging, data surfing, gaming, content accessing, goods purchasing, and service purchasing.

Proposed to replace claim 6:

36. The non-transitory computer readable storage medium of claim 31, wherein the one or more policies comprise one or more of a time-based policy, a location-based policy, and quality of service-based policy.

Proposed to replace claim 7:

37. The non-transitory computer readable storage medium of claim 31, wherein the computing device is associated with a plan managed by the administrator, wherein the plan is shared with a plurality of computing devices.

Proposed to replace claim 8:

38. The non-transitory computer readable storage medium of claim 37, wherein the one or more policies are accessible by the administrator, and wherein each computing device from the plurality of computing devices is associated with a set of one or more policies, and wherein each set of one or more policies is customizable by the administrator.

Proposed to replace claim 9:

39. The non-transitory computer readable storage medium of claim 38, wherein the lists of one or more policies are accessible by the administrator via a website.

Proposed to replace claim 10:

40. The non-transitory computer readable storage medium of claim 31, wherein the one or more policies comprise one or more blocked contacts associated with one

or more computing devices, wherein the decision denies the request when the remote computing device is associated with the one or more blocked contacts.

Proposed to replace claim 11:

41. The non-transitory computer readable storage medium of claim **31**, wherein the one or more policies control content that can be sent, received, or used by the computing device.

Proposed to replace claim 12:

42. The non-transitory computer readable storage medium of claim **31**, further comprising instructions that, when executed on the computing device, cause the computing device to receive a notification when the response denies the request.

Proposed to replace claim 27:

43. A method for controlling a **user's** computing device configured to execute a function using a communication network managed by a service provider, the method comprising, **at the computing device**:

 sending to a server a request to communicate with a remote computing device over the communication network, **wherein the requested communication is to be between the computing device and the remote computing device**;

 receiving in real-time from the server a decision granting or denying the request, the decision being based on a policy stored at the server and configured by an administrator; and

 enforcing the decision by enabling a communication with the remote computing device over the communication network when the decision grants the request and by disabling the communication when the decision denies the request, the communication being enabled or disabled without storing the policy on the computing device.

Proposed to replace claim 28:

44. The computing device of claim 43, wherein the decision that denies the request is further indicative of terminating the request, redirecting the request, or degrading the request.

Proposed to replace claim 29:

45. The computing device of claim 44, wherein the policy comprises a quality of service policy, and wherein the degrading the request is based on the quality of service policy.

CERTIFICATE OF SERVICE

The undersigned certifies that, a true and correct copy of the foregoing Patent Owner's Reply in Support of Revised Contingent Motion to Amend was served via electronic mail upon counsel of record for Petitioners at the following addresses:

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/ Robert L. Hails / _____