Paper No. _____

Filed on behalf of Hewlett-Packard Company
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HEWLETT-PACKARD COMPANY,
Petitioner

v.

MPHJ TECHNOLOGY INVESTMENTS, LLC,
Patent Owner

Inter Partes Review No. Unassigned
Patent 6,771,381

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT 6,771,381

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EXHIBIT LIST (37 C.F.R. § 42.63(e))

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Inter Partes review under 35 U.S.C. § 311 and 37 C.F.R. § 42.101 of United States Patent No. 6,771,381 to Klein, titled "Distributed Computer Architecture and Process for Virtual Copying" (hereinafter "the '381") is hereby requested. The '381 is provided as HP 1001. The petition for *Inter Partes* review is brought on behalf of Hewlett-Packard Company.

I. Mandatory Notices (37 C.F.R. § 42.8(a)(1))

Real Party-In-Interest: Hewlett-Packard Company

Notice of Related Matters: The Vermont Attorney General filed a consumer protection lawsuit, State of Vermont v. MPHJ Technology Investments LLC, no. 282-5-13 (Vermont Superior Court, Washington Unit), alleging unfair and deceptive practices associated with the assertion of the '381 and related patents. *See* HP 1016 p.14 *et seq*.

Designation of Lead and Backup Counsel:

Lead: Stuart P. Meyer, Reg. No. 33,426. **Backup Counsel:** Jennifer R. Bush, Reg. No. 50,784. **Address for both:** FENWICK & WEST LLP, 801 California Street, Mountain View, CA 94041, Tel: (650) 335-7286, Fax: (650) 938-5200.

Service Information: Please address all correspondence to the lead counsel at the address shown above. Petitioner consent to service at: smeyer@fenwick.com.

II. Grounds for Standing (37 C.F.R. § 42.104(a))

Petitioner hereby **certifies** that the patent for which review is sought is available for *inter partes* review and that the petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in the petition.

III. Threshold for Review

A petition for *inter partes* review must demonstrate "a reasonable likelihood that the petitioner would prevail with respect to at least one of the claims challenged in the petition." 35 U.S.C. § 314(a). The Petition meets this threshold. Each of the elements of claims 1-15 of the '381 are taught in the prior art as explained below in the proposed grounds of unpatentability. Each reference is non-redundant and has particular, unique relevance. *See* HP 1005 ¶364-371. Additionally, for those Grounds under 35 U.S.C. § 103(a), the motivation to combine is provided.

IV. Identification of Challenge (37 C.F.R. § 42.104(b))

A. Background

The'381 is asserted to provide a "Virtual Copier" or "VC" that "involves paper being scanned from a device at one location and copied to a device at another location." HP 1001 5:49-51.

The application that matured into the '381 was filed 11/12/99 as s/n

09/438,300. The '300 application was originally filed with a single priority claim to a provisional application, s/n 60/108,798, filed on 11/13/98; the '300 application incorporated by reference (but did not claim priority to) six non-provisional applications filed in 1997. *See* HP 1002 p. 96. The applicant later attempted to add priority claims to these applications and six additional applications, as well as to incorporate by reference those six additional applications. The attempted priority claims were never recognized by the PTO, as shown on the cover page of the '381 and as indicated by the sole cited prior art reference in the prosecution post-dating any earlier priority date. Applicant never sought, by petition, certificate of correction or otherwise to have such priority claims entered. *See* HP 1001, cover page; HP 1002 pp. 708-09, 1007-08, 1040. The attempted post-filing incorporation by reference was likewise untimely and defective. MPEP 201.11(F) (2/03); *see* HP 1003. Thus, the effective priority date of the '381 is 11/13/1998.

B. Claim Construction

The terms in claims 1-15 are to be given their broadest reasonable interpretation, as understood by one of ordinary skill in the art and consistent with the disclosure. *See* 37 C.F.R. § 42.100(b); HP 1005 ¶22. The clause "at least one of" is used frequently throughout the claims, which is understood to require the listed components in the alternative. *See* HP 1005 ¶51.

With respect to claim 1, the broadest reasonable interpretation of [1.P], to the extent that the preamble is considered a limitation on the scope of the claim, includes a computer system that manages and can print an electronic document. *See* MPEP 2111.02; HP 1001 FIG. 28; HP 1005 ¶54-55. The "memory" of [1.1] includes media such as CD ROM, floppy disks, ROM and RAM. *See* HP 1001 62:30-40, FIG. 15 (66, 68, 70), FIG. 17; HP 1005 ¶56-57. "Interface protocols for interfacing and communicating" of [1.1] are understood to be known communications protocols. *See* HP 1001 14:55-60; HP 1005 ¶56-57. "Responsively connectable" as used in [1.2] is understood to mean in communication with. *See* HP 1001 FIG. 15 (CPU 58), 12:61-65, 14:39-4, 21:10-17, 62:30-41; HP 1005 ¶58. Note that "at least one of" as the final clause in [1.2] means that the claim is satisfied by either [1.3] or [1.4]. *See* HP 1005 ¶58.

The '381 describes "five essential modules" of the virtual copier: server, input, output, client, and process; "[e]ach module is a counterpart to an aspect that is found on a conventional copier." *See* HP 1001 7:66-8:1, 8:11-13, FIG. 31; HP 1005 ¶60. Two of the essential modules are recited in claim 1. Element [1.3] recites an input module, which is "a counterpart to a scanner subsystem of a conventional copier." *See id*. at ¶59-61. Element [1.3] is understood as software for receiving documents from a scanner, digital copier, or application. *See* HP 1001 7:66-8:13, 46:10-15, 70:60-67; HP 1005 ¶59-61. Element [1.4] is understood

to be the server module, another of the essential modules, and is understood as being in communication with at least the input module. *See* HP 1005 ¶62-64. Element [1.4] is understood to be software that is in communication with the input module, and that allows third-party applications to interact with a digital capturing or imaging device. *See* HP 1001, 8:50-56, 49:14-20, 70:66-67, 72:50-56, FIG. 33; HP 1005 ¶62-64. Elements [14.P]-[14.4] of claim 14 include similar terms as described for claim 1, and thus those terms are understood to have similar meanings. *See* HP 1005 ¶110.

Element [3.1] is understood to recite using software to transmit an image to another device or an application over the Internet. *See* HP 1001 46:18-20, 69:52-54; HP 1005 ¶66. The phrase "without the need to modify the destination application" in [4.1] is understood to mean no changes are required to the third-party application for the VC to operate. *See* HP 1001 49:38-42, 73:8-12; HP 1005 ¶67. Element [5.1] is understood to recite an interface for selecting devices and applications and a single GO operation. *See* HP 1001 Abstract, 5:54-61, 46:17-24, 70:33-37, 72:49-50, FIG. 30; HP 1005 ¶68-69. Element [6.1] is understood to mean adding support for electronic or paper document processing. *See* HP 1001 15:7-12; HP 1005 ¶70.

Claim 7 recites the remaining three of the "five essential modules." Element [7.1] recites an output module, which is a counterpart to a printer or fax subsystem

of a conventional copier. Element [7.1] is understood to recite software for managing the output of paper of electronic documents to external devices or applications. *See* HP 1001 8:14-23, 48:47-55, 72:14-23; HP 1005 ¶72-73. Element [7.2] recites a process module, which is a counterpart to a controller of a conventional copier, and is understood to provide software for processing of electronic paper. *See* HP 1001 8:24-33, 48:56-65, 72:24-33; HP 1005 ¶74-75. Element [7.3] recites a client module, which is the counterpart to the panel of a conventional copier, and is understood to provide software for presenting information about the electronic paper as it is being processed. *See* HP 1001 8:34-43, 48:66-49:8, 72:34-43, FIG. 43; HP 1005 ¶76-78. Element [8.1] recites a computer data management system that can be either external or embedded. *See* HP 1001 Abstract, 46:20-25; HP 1005 ¶79-80.

Claim 9 provides additional limitations for the server module and provides means-plus-function limitations; virtually no structure is provided corresponding to these means. *See* HP 1005 ¶81-95. Element [9.1] recites enable virtual copy operation means, understood to provide simple methods to initiate, cancel, and reset VC. *See* HP 1001 74:9-12, FIG. 44, FIG. 48; HP 1005 ¶82-83. Element [9.2] recites maintain list of available module means, [9.3] recites maintain currently active modules means, and [9.4] recites maintain complete document information means. Element [10.1] recites a server API within the server. Elements [9.2]-[9.4]

and [10.1] are understood to recite conventional Windows features such as registries and COM objects. *See* HP 1001 9:56-61, 50:21-26, 53:30-33, 74:13-33, FIG. 36, FIG. 43; HP 1006 p.115; HP 1005 ¶84-97. Elements [11.P]-[11.4] of claim 11 and [13.P]-[13.4] of claim 13 include similar terms as described for claim 9, and thus those terms are understood to have similar meanings. *See also* HP 1005 ¶98-103, 110.

Element [12.P] of claim 12 is identical to [1.P]; [12.1] is similar to [5.1]; thus the analysis of these elements applies here. *See* HP 1005 ¶104-105. Element [12.2] recites similar limitations to [6.1] ("adding …paper processing with a single programming step") and [4.1] ("without the need to modify the destination application"); thus the same analysis applies here. *See* HP 1001 6:17-19; HP 1005 ¶106. Element [12.3] is understood to recite a copier interface including either selection of a file and source or destination or access to a tutorial or options. *See* HP 1001 FIG. 31; HP 1005 ¶107-108. Elements [15.P]-[15.2] of claim 15 include similar terms as described for claim 12, and thus those terms are understood to have similar meanings. *See* HP 1005 ¶111.

C. Technical Introduction

The '381 includes 15 claims, five of which are independent (1, 12, 13, 14 and 15). All of the claims are directed to a computer data management system, with variations on features as detailed in the charts below.

Throughout the 1990s, HP produced a variety of products that combined various features of scanners, copiers, printers and document management applications. *See* HP 1005, ¶112. As set forth below in greater detail, at least six references relating to these HP products anticipate all of the claims of the '381; another reference anticipates most claims and renders the others obvious in combination with one of the anticipating references.

D. Ground 1: Claims 1-15 are anticipated under 35 U.S.C. § 102(b) by HP ScanJet 5 Scanner User's Guide ("SJ5," HP 1006).

The HP ScanJet 5 Scanner User's Guide (hereinafter "SJ5," HP 1006) was published in 1997, more than one year before the effective filing date of the '381. Thus, SJ5 qualifies as prior art under at least 35 U.S.C. § 102(b). SJ5 discloses each and every limitation of claims 1-15 of the '381.

SJ5 ANTICIPATES THE '381
***[1.P]* 1. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
SJ5 anticipates [1.P] by showing it can scan items and store and distribute them electronically, e.g., to destinations including a fax machine and an Internet email address. *See* HP 1006 p.11, 18; *see* HP 1005 ¶115.
***[1.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
SJ5 anticipates [1.1] because ScanJet 5 software installation, including for ScanJet 5 Utility, PaperPort, and OCR, state that it can be done on a local or network drive (memory) location. *See* HP 1006 p.12; *see* HP 1005 ¶116.
***[1.2]* at least one processor responsively connectable to said at least one**

memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:
SJ5 anticipates [1.2] by including disclosure of "OCR software." A person of ordinary skill in the art ("POSA" herein) would understand that, to apply OCR requires such a processor. *See* HP 1006 p.12, 93, 97; *see* HP 1005 ¶117.
***[1.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
SJ5 anticipates [1.3] by showing an imaging device to capture images from paper via a scanner (scanner as an input source is inherent). SJ5 also discloses OCR software to manage electronic paper. *See* HP 1006 p.12, 21; *see* HP 1005 ¶118.
***[1.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
SJ5 anticipates [1.4] by allowing a user to "electronically link scanned documents to other applications such as fax, electronic mail (e-mail), and word processing applications." POSA would understand that linking to external applications would include a module capable of combining the device with the linked applications. *See* HP 1006 p.47; *see* HP 1005 ¶119.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.
SJ5 anticipates [2.1] by external devices and applications including a printer, a fax machine, and a scanner. *See* HP 1006 p.18; *see* HP 1005 ¶120.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an image using software so that the image gets seamlessly replicated and transmitted to at least one of other devices and applications, and via the Internet.
SJ5 anticipates [3.1] because users can transmit data to destinations including an email address. Users can make this transmission seamless by creating "automatic workflows" in the ScanJet 5 Utility. In addition, users can copy the scanned document to a printer and send scanned items to other applications with the PaperPort software. *See* HP 1006 p.18, 33; *see* HP 1005 ¶121.

4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
SJ5 anticipates [4.1] because users "can send scanned items to other applications using icons on the Link Bar" of the PaperPort software. When users select an automatic workflow, the incoming electronic document bypasses the inbox and goes straight to the target application. SJ5 provides no discussion of a need to modify the application. *See* HP 1006 p.35, 89; *see* HP 1005 ¶122.
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables copying images between physical devices, applications, and the Internet using a single "GO" operation.
SJ5 anticipates [5.1] because it discloses an interface that enables a user to send data from the scanner to an application, fax machine, or Internet e-mail address by pressing a Go key. *See* HP1006 p.15, 18, FIG. 1; *see* HP 1005 ¶123.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
SJ5 anticipates [6.1] by OCR software that provides electronic document processing. *See* HP 1006 p.12, 93; *see* HP 1005 ¶124.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
SJ5 anticipates [7.P] by that the ScanJet 5 includes the HP Network ScanJet 5 Utility and PaperPort software. *See* HP 1006 p.12; *see* HP 1005 ¶125.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a digital copier, and managing the output of the data to the third-party software application;**
SJ5 anticipates [7.1] for the same reasons [1.1], [1.2], 1.4], [2.1] are anticipated by SJ5. *See* HP 1006 p.12, 18, 47; *see* HP 1005 ¶126.
***[7.2]* at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**

SJ5 anticipates [7.2] because users can create automatic workflows that are "associated with a named group of settings," applying multiple processes to a single virtual copy. *See* HP 1006 p.33 *See also* reasons [6.1] is anticipated by SJ5; *see* HP 1006 p.12, 93; *see* HP 1005 ¶127.
***[7.3]* at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
SJ5 anticipates [7.3] by PaperPort displaying page images as scanned, as well as status information. *See* HP 1006 p.28, 48,FIG. 13; *see* HP 1005 ¶128.
8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
SJ5 anticipates [8.1] as "Links" that can be made to various third party programs. *See* HP 1006 p. 12, 35, 89 *et seq.* (Ch. 8); *see* HP 1005 ¶129.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
SJ5 anticipates [9.P] because the PaperPort software provides communication with various modules and third party applications. The ScanJet 5 also allows users to transmit data to destinations including an "Internet email address." *See* HP 1006 p.18, 47 *et seq*. (Ch. 4), 79 *et seq*. (Ch. 7); *see* HP 1005 ¶130.
***[9.1]* enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
SJ5 anticipates [9.1] by showing a control panel that includes a GO button to initiate a scan and an Abort button to cancel and reset, which require corresponding underlying software. Power cycling is also described as a reset technique. *See* HP 1006 p.15, 21, 28, 100, FIG. 1; *see* HP 1005 ¶131.
***[9.2]* maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
SJ5 anticipates [9.2] for the same reasons [1.3], [1.4], [7.1], [7.2] are anticipated by SJ5. *See* HP 1006 p.12, 18, 21, 47, 93. The ScanJet 5 Utility maintains lists of destinations and workflows, and is started automatically when Windows is started. POSA would recognize from this that a list of active processes/programs would be stored in a registry. *See id.* at 33-34, 114; *see* HP 1005 ¶132.
***[9.3]* maintain currently active modules means for maintaining said input,**

output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and
SJ5 anticipates [9.3] for the same reasons [1.3], [1.4], [7.2] are anticipated by SJ5. *See* HP 1006 p.12, 18, 21, 47, 93. Further, the ScanJet Utility allows a user to set up lists of destinations, addresses, workflows, etc., viewable "at any time" on a profile tab. *See* HP 1006 p.40; *see* HP 1005 ¶133.
[9.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
SJ5 anticipates [9.4] by that a user can provide a title for an item via the PaperPort software (information regarding a current file), which saved title can later be edited. *See* HP 1006 p.28, 48, 51, FIG. 13; *see* HP 1005 ¶134.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
SJ5 anticipates [10.1] by disclosure of the ability to send scanned items to other applications using icons on the Link Bar of the PaperPort software. POSA would recognize that feature as providing an API (e.g., MAPI per the Troubleshooting section, an API commonly used with Microsoft Windows systems. *See* HP 1006 p.35, 89, 115. SJ5's communications protocols and drivers are described above in conjunction with [1.1], [1.4]. *See* HP1006 p.12, 47; *see* HP 1005 ¶135.
11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:
SJ5 anticipates [11.P] by disclosure of MAPI as discussed in [10.1], which POSA would recognize as being an example of a COM-based (Component Object Model) interface. *See* HP 1006 p.35, 89, 115; *see* HP 1005 ¶136.
[11.1] **at least one modules object maintaining a first list of available input, output, and process modules;**
[11.2] **at least one program object maintaining a second list of currently selected input, output, and process modules;**
SJ5 anticipates [11.1], [11.2] for the same reasons [1.3], [7.1], [7.2] are anticipated by SJ5. *See* HP 1006 p.12, 18, 21, 47, 93. The ScanJet 5 Utility allows users to create an output destinations list. POSA would recognize that these features are disclosed. *See* HP 1006 p.33, 35; *see* HP 1005 ¶137-138.
[11.3] **at least one document object maintaining information regarding a current document being copied;**
SJ5 anticipates [11.3] for the same reasons [9.4] is anticipated by SJ5. *See* HP

1006 p.28, 48, 51; *see* HP 1005 ¶139.
[11.4] **at least one system management method object used to initiate, cancel, and reset said computer data management system;**
SJ5 anticipates [11.4] for the same reasons [9.1] is anticipated by SJ5. *See* HP 1006 p.21, 28, 100, 122; *see* HP 1005 ¶140.
[11.5] **at least one system management event object used to provide feedback to the Client Module.**
SJ5 anticipates [11.5] by describing various user interface communication systems, for example, images of scanned pages and information including pages scanned and error messages. *See* HP 2006 p.28, 35, 48; *see* HP 1005 ¶141.
[12.P] **12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
SJ5 anticipates [12.P] for the same reasons [1.P] is anticipated by SJ5. *See* HP 1006 p.11, 18; *see* HP 1005 ¶142.
[12.1] **(a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
SJ5 anticipates [12.1] for the same reasons [1.4], [5.1] are anticipated by SJ5. *See* HP 1006 p.15, 18, 47; *see* HP 1005 ¶143.
[12.2] **(b) a one step programming method to add paper support to electronic business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in software;**
SJ5 anticipates [12.2] for the same reasons [4.1] is anticipated by SJ5. *See* HP 1006 p.35, 89; *see* HP 1005 ¶144.
[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
SJ5 anticipates [12.3] for the same reasons [5.1] is anticipated by SJ5. *See* HP

1006 p.15, 18, 48; *see* HP 1005 ¶145.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[13.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
[13.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
SJ5 anticipates [13.P]-[13.4] for the same reasons [9.P]-[9.4] are anticipated by SJ5. *See* HP 1006 p.12, 18, 21, 28, 33-34, 40, 47-48, 51, 79, 93, 100, 114, 21, 122; *see* HP 1005 ¶146.
[14.P] **14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
[14.1] **at least one memory storing a plurality of interface protocols for interfacing and communicating;**
[14.2] **at least one processor responsively connectable to said at least one memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:**
[14.3] **at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**

[14.4] **at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
SJ5 anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by SJ5. *See* HP 1006 p.11, 12, 18, 21, 47; *see* HP 1005 ¶147.
[15.P] **15. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
[15.1] **(a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
[15.2] **(b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
SJ5 anticipates [15.P]-[15.2] for the same reasons [12.P]-[12.3] are anticipated by SJ5. *See* HP 1006 p.15, 18, 35, 47-48, 89; *see* HP 1005 ¶148.

E. Ground 2: Claims 1-15 are anticipated under 35 U.S.C. § 102(b) by HP ScanJet 4Si Technical Support Solutions Guide ("SJ4SI," HP 1007).

The HP ScanJet 4Si Scanner Technical Support Solutions Guide (hereinafter "SJ4SI," HP 1007) was published in 1995, more than one year before the effective filing date of the '381. Thus, SJ4SI qualifies as prior art under at least 35 U.S.C. § 102(b). SJ4SI discloses each and every limitation of claims 1-15 of the '381.

SJ4Si ANTICIPATES THE '381
[1.P] **1. A computer data management system including at least one of an electronic image, graphics and document management system capable of**

transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:
SJ4Si anticipates [1.P] by that it is "a network scanner that captures paper-based information in electronic form for distributing, sharing, and filing within a workgroup." HP 1007 p.1-2, FIG. 1-1; *see* HP 1005 ¶151.
***[1.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
SJ4Si anticipates [1.1] because a user can use PaperPort links to send scanned documents to destinations including email and word processing applications. POSA would understand that linking to a plurality of destinations requires such a memory. *See* HP 1007 p.3-15; *see* HP 1005 ¶152.
***[1.2]* at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:**
SJ4Si anticipates [1.2] by that the ScanJet4Si includes PaperPort OCR software, which would be understood by POSA to indicate a processor in communication with the memory *See* HP 1007 p.3-27; *see* HP 1005 ¶153.
***[1.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
SJ4Si anticipates [1.3] by the imaging device of the ScanJet 4Si is a paper scanner (scanner as an input source is inherent). *See* HP p.1007 1-2; *see* HP 1005 ¶154.
***[1.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
SJ4Si anticipates [1.4] by allowing selection of several PaperPort links, including E-Mail, Groupware, Word Processing, Fax, and OCR, for the scanned image data. POSA would understand linking uses a module capable of combining the imaging device with the applications. *See* HP 1007 p.3-15; *see* HP 1005 ¶155.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.

SJ4Si anticipates [2.1] by transmitting data to a fax machine, *see* HP 1007 p.3-23, or a network printer, *see* HP 1007 p.2-26; *see* HP 1005 ¶156.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an image using software so that the image gets seamlessly replicated and transmitted to at least one of other devices and applications, and via the Internet.
SJ4Si anticipates [3.1] because users can "send [an] item as an electronic fax." In addition, the ScanJet 4Si "provides users with a direct and seamless connection to their network." *See* HP 1007 p.3-23; *see* HP 1005 ¶157.
4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
SJ4Si anticipates [4.1] because scanned items can be manipulated using the PaperPort software and, using Drag & Drop, can be sent to other applications, such as word processing, fax, and e-mail. *See* HP 1007 p.3-3; *see* HP 1005 ¶158.
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables copying images between physical devices, applications, and the Internet using a single "GO" operation.
SJ4Si anticipates [5.1] because the PaperPort software interface permits Drag & Drop transmission of data to a fax machine and to applications. *See* HP 1007 p.1-14, 3-3. In addition, SJ4Si discloses initiating a scan by pressing the Start button on the control panel. *See* HP 1007 p.1-9; *see* HP 1005 ¶159.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
SJ4Si anticipates [6.1] by PaperPort OCR software, which processes scanned text. *See* HP 1007 p.3-17, 3-21; *see* HP 1005 ¶160.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
SJ4Si anticipates [7.P] by Administrative Software (configuring device), ScanJet 4Si Utility (user settings), and Visioneer PaperPort (manipulating scanned documents). *See* HP 1007 p.1-3; *see* HP 1005 ¶161.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a**

digital copier, and managing the output of the data to the third-party software application;
SJ4Si anticipates [7.1] for the same reasons [1.1], [1.2], [1.4], [2.1] are anticipated by SJ4Si. *See* HP 1007 p. 2-26, 3-15, 3-21, 3-23, 3-27; *see* HP 1005 ¶162.
***[7.2]* at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**
SJ4Si anticipates [7.2] for the same reasons [6.1] is anticipated by SJ4Si. *See* HP 1007 p.3-17, 3-21; *see* HP 1005 ¶163.
***[7.3]* at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
SJ4Si anticipates [7.3] because it discloses displays of an electronic thumbnail image when an item is scanned, and monitoring of scanner status. *See* HP 1007 p.1-2, 1-4; *see* HP 1005 ¶164.
8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
SJ4Si anticipates [8.1] by references to links that can be made to various third party programs. See*, e.g.*, HP 1007 p.1-14; *see* HP 1005 ¶165.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
SJ4Si anticipates [9.P] by PaperPort software as providing communication with modules and applications. *See* HP 1007 p.3-15; *see* HP 1005 ¶166.
***[9.1]* enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
SJ4Si anticipates [9.1] because it shows the control panel including a Start key to initiate scanning, a Stop key to cancel, and an Abort key to reset. *See* HP 1007 p.2-13, 3-3, 3-4, FIG. 7. In addition, conventional power cycling is described as a reset technique. *See* HP 1007 p.1-10, 5-18; *see* HP 1005 ¶167.
***[9.2]* maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by**

said input, output, client, process and server modules;
SJ4Si anticipates [9.2] for th same reasons [1.3], [1.4], [7.1], [7.2] is anticipated by SJ4Si. *See* HP 1007 p.1-2, 2-26, 3-15, 3-17, 3-21, 3-23, 3-27. Further, PaperPort software and ScanJet Utility maintain lists of destinations, workflows. POSA would recognize that a list of active processes and programs would be stored in such a registry. *See* HP 1007 p.1-4; *see* HP 1005 ¶168.
[9.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
SJ4Si anticipates [9.3] because PaperPort allows users to select from a variety of destinations, including email and fax. SJ4Si discloses operating system support including Microsoft Windows and communications among devices and applications using Windows facilities. POSA would recognize that a list of active processes and programs would be stored in the system. *See* HP 1007 p.1-13, 3-16; *see* HP 1005 ¶169.
[9.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
SJ4Si anticipates [9.4] by allowing users to configure settings for a current file being copied. *See* HP 1007 p.2-28. SJ4Si discloses operating system support including Microsoft Windows and communications among devices and applications using Windows facilities. POSA would recognize that storing such information for later use involves some sort of file for the information. *See also* anticipation of [7.3] by SJ4Si above. *See* HP 1007 p.1-13; *see* HP 1005 ¶170.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
SJ4Si anticipates [10.1] for the same reasons [1.1], [1.4], [8.1] are anticipated by SJ4Si. Numerous references are made to links that can be made to various third party programs. POSA would recognize that these links to applications require an API. See*, e.g.*, HP 1007 p.1-14; *see* HP 1005 ¶171.
11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:
SJ4Si anticipates [11.1] by disclosure of an API as discussed in [10.1], which POSA would recognize as being an example of a COM-based (Component Object Model) interface. *See* HP 1007 p.1-14; *see* HP 1005 ¶172.
[11.1] **at least one modules object maintaining a first list of available input,**

output, and process modules;
[11.2] **at least one program object maintaining a second list of currently selected input, output, and process modules;**
SJ4Si anticipates [11.1], [11.2] for the same reasons [1.3], [7.1], [7.2] are anticipated by SJ4Si. *See* HP 1007 p.1-2, 2-26, 3-15, 3-17, 3-21, 3-23, 3-27. Links in the PaperPort software allow users to choose from a list of outputs. *See* HP 1007 p.1-14, 2-28; *see* HP 1005 ¶ 173, 174.
[11.3] **at least one document object maintaining information regarding a current document being copied;**
SJ4Si anticipates [11.3] for the same reasons [9.4] is anticipated by SJ4Si. *See* HP 1007 p.1-13, 2-28; *see* HP 1005 ¶175.
[11.4] **at least one system management method object used to initiate, cancel, and reset said computer data management system;**
SJ4Si anticipates [11.4] for the same reasons [9.1] is anticipated by SJ4Si. *See* HP1007 p.1-10, 2-13, 3-3, 5-18, FIG. 7; *see* HP 1005 ¶176.
[11.5] **at least one system management event object used to provide feedback to the Client Module.**
SJ4Si anticipates [11.5] by describing various user interface communication systems. For example, the HP ScanJet 4Si Utility allows users to monitor scanner status. *See* HP 1007 p.1-4; *see* HP 1005 ¶177.
[12.P] **12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
SJ4Si anticipates [12.P] for the same reasons [1.P] is anticipated by SJ4Si. *See* HP 1007 p.1-2; *see* HP 1005 ¶178.
[12.1] **(a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
SJ4Si anticipates [12.1] for the same reasons [1.4], [5.1] are anticipated by SJ4Si. *See* HP 1007 p.1-14, 3-3, 3-15; *see* HP 1005 ¶179.
[12.2] **(b) a one step programming method to add paper support to electronic business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in**

software;
SJ4Si anticipates [12.2] for the same reasons [4.1] is anticipated by SJ4Si. *See* HP 1007 p.3-3; *see* HP 1005 ¶180.
[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
SJ4Si anticipates [12.3] for the same reasons [5.1] is anticipated by SJ4Si. *See* HP 1007 p.3-3, 1-14; *see* HP 1005 ¶181.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[13.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
[13.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
SJ4Si anticipates [13.P]-[13.4] for the same reasons [9.P]-[9.4] are anticipated by SJ4Si. *See* HP 1007 p.1-2, 1-4, 1-10, 1-13, 2-13, 2-26, 2-28, 3-3, 3-15, 3-16, 3-17, 3-21, 3-23, 3-27, 5-18, FIG. 7; *see* HP 1005 ¶182.
[14.P] **14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
[14.1] **at least one memory storing a plurality of interface protocols for interfacing and communicating;**
[14.2] **at least one processor responsively connectable to said at least one**

memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:
[14.3] **at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
[14.4] **at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
SJ4Si anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by SJ4Si. *See* HP 1007 p.1-2, 3-15, 3-21, 3-27; *see* HP 1005 ¶183.
[15.P] **15. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
[15.1] **(a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
[15.2] **(b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
SJ4Si anticipates [15.P]-[15.2] for the same reasons [12.P]-[12.3] are anticipated by SJ4Si. *See* HP 1007 p.1-2, 1-14, 3-3, 3-15; *see* HP 1005 ¶184.

F. Ground 3: Claims 1-15 are anticipated under 35 U.S.C. § 102(b) by HP LaserJet 3100 Product User's Guide ("3100," HP 1009).

The HP LaserJet 3100 Product User's Guide (hereinafter "LJ3100," HP 1009) was published in 1997, more than one year before the effective filing date of the '381. Thus, LJ3100 qualifies as prior art under at least 35 U.S.C. § 102(b). LJ3100 discloses each and every limitation of claims 1-15 of the '381.

LJ3100 ANTICIPATES THE '381
***[1.P]* 1. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
LJ3100 anticipates [1.P] by sending faxes from, and receiving them at, a computer (PC Faxing). *See* HP 1009 p.9; *see* HP 1005 ¶223.
***[1.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
LJ3100 anticipates [1.1] by software access to product setup, fax and copy options, and speed-dial codes, understood by a POSA as requiring such a memory. *See* HP 1009 p.12; *see* HP 1005 ¶224.
***[1.2]* at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:**
LJ3100 anticipates [1.2] by use of OCR software, which a POSA would understand requires such a processor. *See* HP 1009 p.2, 14, 33; *see* HP 1005 ¶225.
***[1.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
LJ3100 anticipates [1.3] by a scanner (imaging device, selection as input source is inherent). *See* HP 1009 p.12; *see* HP 1005 ¶226.

[1.4] **at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
LJ3100 anticipates [1.4] by a menu of selectable options for transferring the data to another device, including "Scan to Email" and "Fax." *See* HP 1009 p.50; *see* HP 1005 ¶227.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.
LJ3100 anticipates [2.1] by external devices including a printer, a fax machine, and a scanner. *See* HP 1009 p.50; *see* HP 1005 ¶228.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an image using software so that the image gets seamlessly replicated and transmitted to at least one of other devices and applications, and via the Internet.
LJ3100 anticipates [3.1] by allowing users to transmit data to destinations including email applications. *See* HP 1009 p.133; *see* HP 1005 ¶229.
4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
LJ3100 anticipates [4.1] because users can "send scanned items and faxes to other functions and programs" by using link icons. The task for an icon then begins or opens and the selected item appears in an unnamed file. *See* HP 1009 p.128-129; *see* HP 1005 ¶230.
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables copying images between physical devices, applications, and the Internet using a single "GO" operation.
LJ3100 anticipates [5.1] by PC fax software that allows users to send PC faxes by clicking "Fax," or to begin copying by pressing the Copy key on the control panel. *See* HP 1009 p.12, 48, 50, 63; *see* HP 1005 ¶231.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
LJ3100 anticipates [6.1] by adding OCR processing when a user takes the single

step of selecting "Scan to Text." *See* HP 1009 p.129; *see* HP 1005 ¶232.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
LJ3100 anticipates [7.P] by JetSuite Pro software. *See* HP 1009 p.121; *see* HP 1005 ¶233.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a digital copier, and managing the output of the data to the third-party software application;**
LJ3100 anticipates [7.1] for the same reasons [1.1], [1.2], [1.4], [2.1] are anticipated by LJ3100. *See* HP 1009 p.12, 14, 33, 50; *see* HP 1005 ¶234.
***[7.2]* at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**
LJ3100 anticipates [7.2] for the same reasons [6.1] is anticipated by LJ3100. *See* HP 1009 p.129; *see* HP 1005 ¶235.
***[7.3]* at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
LJ3100 anticipates [7.3] because the Document Assistant software viewer displays images of pages as scanned. *See* HP 1009 p.125; *see* HP 1005 ¶236.
8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
LJ3100 anticipates [8.1] by disclosure of end-user PaperPort software, which can be installed on a user's computer or on a network location. *See* HP 1009 p.12, 14,127-128; *see* HP 1005 ¶237.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
LJ3100 anticipates [9.P] because the Document Assistant software is described as providing communication with various modules and third party applications. *See* HP 1009 p. 128; *see* HP 1005 ¶238.
***[9.1]* enable virtual copy operation means for initiating, canceling, and**

resetting said computer data management system;
LJ3100 anticipates [9.1] by a control panel that includes a copy initiation and stop/clear functionality; POSA would understand these features as indicating a corresponding software protocol. Power cycling is also described as a reset technique. *See* HP 1009 p. 48, 184. In addition, LJ3100 discloses compatibility with Windows operating systems. *See* HP 1009 p.14; *see* HP 1005 ¶239.
[9.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
LJ3100 anticipates [9.2] by input, output, and process modules and links to available resources. LJ3100 anticipates [9.2] for the same reasons [1.3], [1.4], [7.1], [7.2] are anticipated by LJ3100. *See* HP 1009 p.12, 14, 33, 50, 128; *see* HP 1005 ¶240.
[9.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
LJ3100 anticipates [9.3] because the Document Assistant allows users to select from a variety of destinations, including email and fax. *See* HP 1009 p.14, 137; *see* HP 1005 ¶241.
[9.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
LJ3100 anticipates [9.4] by allowing users to configure and revise settings for a current file being copied. *See* HP 1009 p.128. *See also* the rationale for [7.3] above. *See* HP 1009 p.14, 125; *see* HP 1005 ¶242.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
LJ3100 anticipates [10.1] by various communications protocols and drivers disclosed, *see* rationale of anticipation of [1.1],[1.4] by LJ3100 above. *See* HP 1009 p.12, 50. Numerous references are made to links that can be made to various third party programs. POSA would recognize that these links to applications require an API. *See* HP 1009 p.14, 128-129; *see* HP 1005 ¶243.
11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:

LJ3100 anticipates [11.P] by the API as discussed in [10.1], an example of a COM-based (Component Object Model) interface. *See* HP 1009 p.12, 14, 50, 128; *see* HP 1005 244.
[11.1] **at least one modules object maintaining a first list of available input, output, and process modules;**
LJ3100 anticipates [11.1] for the same reasons [1.3], [7.1], [7.2] are anticipated by LJ3100. *See* HP 1009 p.12, 14, 33, 50, 128; *see* HP 1005 ¶245.
[11.2] **at least one program object maintaining a second list of currently selected input, output, and process modules;**
LJ3100 anticipates [11.2] for the same reasons [1.3], [7.1], [7.2], [2.1] are anticipated by LJ3100. *See* HP 1009 p.12, 14, 33, 50, 128; *see* HP 1005 ¶246.
[11.3] **at least one document object maintaining information regarding a current document being copied;**
LJ3100 anticipates [11.3] for the same reasons [9.4] is anticipated by LJ3100. *See* HP 1009 p.128; *see* HP 1005 ¶247.
[11.4] **at least one system management method object used to initiate, cancel, and reset said computer data management system;**
LJ3100 anticipates [11.4] for the same reasons [9.1] is anticipated by LJ3100. *See* HP 1009 p.48, 184; *see* HP 1005 ¶248.
[11.5] **at least one system management event object used to provide feedback to the Client Module.**
LJ3100 anticipates [11.5] by including various user interface communication systems, including PaperPort software that displays an image of pages as scanned. *See* HP 1009 p.127; *see* HP 1005 ¶249.
[12.P] **12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
LJ3100 anticipates [12.P] for the same reasons [1.P] is anticipated by LJ3100. *See* HP 1009 p.9; *see* HP 1005 ¶250.
[12.1] **(a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
LJ3100 anticipates [12.1] for the same reasons [1.4], [5.1] are anticipated by LJ3100. *See* HP 1009 p.50, 63; *see* HP 1005 ¶251.
[12.2] **(b) a one step programming method to add paper support to electronic**

business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in software;
LJ3100 anticipates [12.2] for the same reasons [4.1] is anticipated by LJ3100. *See* HP 1009 p.129; *see* HP 1005 ¶252.
[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
LJ3100 anticipates [12.3] for the same reasons [5.1] is anticipated by LJ3100. *See* HP 1009 p.50, 63; *see also* HP 1005 ¶253.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[13.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
[13.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
LJ3100 anticipates [13.P]-[13.4] for the same reasons [9.P]-[9.4] are anticipated by LJ3100. *See* HP 1009 p. 12, 14, 33, 48, 50, 128, 137, 184; *see* HP 1005 ¶254.
[14.P] **14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**

[14.1] **at least one memory storing a plurality of interface protocols for interfacing and communicating;**
[14.2] **at least one processor responsively connectable to said at least one memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:**
[14.3] **at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
[14.4] **at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
LJ3100 anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by LJ3100. *See* HP 1009 p.9, 12, 14, 33, 50; *see* HP 1005 ¶255.
[15.P] **15. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
[15.1] **(a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
[15.2] **(b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
LJ3100 anticipates [15.P]-[15.2] for the same reasons [12.P]-[12.3] are anticipated by LJ3100. *See* HP 1009 p.9, 50, 63, 129; *see* HP 1005 ¶256.

G. Ground 4: Claims 1-15 are anticipated under 35 U.S.C. § 102(a) by HP 9100C Digital Sender User Guide ("9100C," HP 1008).

The HP 9100C Digital Sender User Guide (hereinafter "9100C," HP 1008) was published on September 21, 1998, before the effective filing date of the '381. Thus, 9100C qualifies as prior art under at least 35 U.S.C. § 102(a). 9100C discloses each and every limitation of claims 1-15 of the '381.

9100C ANTICIPATES THE '381
***[1.P]* 1. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
9100C anticipates [1.P] by "quickly and conveniently distribut[ing] paper documents in electronic format" by "[s]end[ing] a document directly to Internet e-mail destinations." HP 1008 p.7; *see* HP 1005 ¶ 187.
***[1.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
9100C anticipates [1.1] by "a program on your computer that manages fax and e-mail destinations you use at the digital sender" and "routes documents sent to your computer to the storage location." A POSAwould understand these processes as indicating such a memory. *See* HP 1008 p.7; *see* HP 1005 ¶ 188
***[1.2]* at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:**
9100C anticipates [1.2] by an Address Book Manager that allows users to set up destination lists that include email addresses, fax machines, and printers, and a Digital Sender Link that allows users to select a third party application as an automatic, target program. *See* HP 1008 p.8, 15, 50, 77; *see* HP 1005 ¶ 189.
***[1.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least**

one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and
[1.3] is anticipated by 9100C disclosing image capture using a scanner (imaging device, selection as input source is inherent). Data from the imaging device can be sent to a network printer, network folder, or "other HP JetSend-enabled devices in [the user's] office." *See* HP 1008 p.7, 30; *see* HP 1005 ¶ 190.
***[1.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
9100C anticipates [1.4] by allowing selection from a menu of options for transferring data to another device, including E-Mail and PC (send to a computer). *See* HP 1008 p.25. The HP Address Book Manager allows users to set up destination lists that include email addresses, fax machines, and printers. *See* HP 1008 p.15. The Digital Sender Link allows users to select a third party application as an automatic, target program. *See* HP 1008 p.77; *see* HP 1005 ¶ 191.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.
9100C anticipates [2.1] by transmitting data to a fax machine. *See* HP 1008 p.7; *see* HP 1005 ¶ 192.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an image using software so that the image gets seamlessly replicated and transmitted to at least one of other devices and applications, and via the Internet.
9100C anticipates [3.1] because users can transmit data to destinations including "Internet email destinations." *See* HP 1008 p.7, 15; *see* HP 1005 ¶ 193.
4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
9100C anticipates [4.1] by allowing users to select a target program "where documents sent to your computer are ultimately received and viewed." In addition, users "can determine which program is the target program and whether or not that program starts automatically when data is received." *See* HP 1008 p.84; *see* HP 1005 ¶ 194.
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables

copying images between physical devices, applications, and the Internet using a single "GO" operation.
9100C anticipates [5.1] by including a scanner control panel that allows a user to send data from the scanner to an email address or a computer by pressing a single Go key. *See* HP 1008 p.18-19, 24-25; *see* HP 1005 ¶ 195.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
9100C anticipates [6.1] for the same reasons [4.1] is anticipated by 9100C. *See* HP 1008 p.84; *see* HP 1005 ¶ 196.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
[7.P] is anticipated by 9100C's disclosure of HP Digital Sender Link software and HP Address Book Manager software. *See* HP 1008 p.9; *see* HP 1005 ¶ 197.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a digital copier, and managing the output of the data to the third-party software application;**
9100C anticipates [7.1] for the same reasons [1.1], [1.2], 1.4], [2.1] are anticipated by 9100C. *See* HP 1008 p.7-8, 15, 25, 77; *see* HP 1005 ¶ 198.
***[7.2]* at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**
9100C anticipates [7.2] for the same reasons [6.1] is anticipated by 9100C. *See* HP 1008 p.84. In addition, 9100C shows "[d]ata conversion to different data types (text, halftone, and color draft modes)"; and image processing capabilities (black-and-white, fine text (intended for OCR), color, and high-resolution photographs). *See* HP 1008 p.121-122; *see* HP 1005 ¶ 199.
***[7.3]* at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
9100C anticipates [7.3] because it describes a Control Panel Display that displays "information and messages," including error codes. *See* HP 1008 p.18, 97-102. In addition, 9100C describes an activity log that provides "a record of digital sender

use." *See* HP 1008 p.70, 103; *see* HP 1005 ¶ 200.
8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
9100C anticipates [8.1] because the Digital Sender Link integrates the 9100C Digital Sender into external applications. *See* HP 1008 p.84; *see* HP 1005 ¶ 201.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
[9.P] is anticipated by the 9100C describing the HP Address Book Manager and Digital Sender Link as providing communication with various modules and third party applications. *See* HP 1008 p.49 *et seq*.(Ch. 3, Address Book Manager), 77 *et seq*. (CH. 4, Digital Sender Link); *see* HP 1005 ¶ 202.
***[9.1]* enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
9100C anticipates [9.1] by a control panel with a Go key to send a document and a Cancel key to stop sending or return to a main display; POSA would understand these features as indicating a corresponding software protocol. Power cycling is also described as a reset technique. *See* HP 1008 p. 19, 104; *see* HP 1005 ¶ 203.
***[9.2]* maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[9.2] is anticipated by 9100C by including input, output, and process modules and links to available resources. 9100C anticipates [9.2] for the same reasons [1.3], [1.4], [7.1], [7.2] are anticipated by 9100C. *See* HP 1008 p.7-8, 15, 25, 30, 77, 84. In addition, 9100C discloses compatibility with Windows operating systems. *See* HP 1008 p.49; *see* HP 1005 ¶ 204.
***[9.3]* maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
9100C anticipates [9.3] for the same reasons [1.2] is anticipated by 9100C. *See* HP 1008 p.15, 50, 77; *see* HP 1005 ¶ 205.
***[9.4]* maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**

The 9100C anticipated [9.4] by allowing users to configure and revise settings for a current file being copied. *See* HP 1008 p.29. *See also* the rationale for [7.3] above. *See* HP 1008 p.18, 70, 97-102; *see* HP 1005 ¶ 206.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
9100C anticipates [10.1] for the same reasons [1.1], [1.4] are anticipated by 9100C. POSA would understand that the Digital Sender Link feature requires an API. *See* HP 1008 p.7, 15, 25, 77, 84; *see* HP 1005 ¶ 207.
11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:
The 9100C anticipates [11.P] by facilitating communication between devices and systems. 9100C anticipates [11.P] for the same reasons [1.P], [10.1] are anticipated by 9100C. *See* HP 1008 p.7. 9100C discloses the API as discussed in [10.1], an example of a COM-based (Component Object Model) interface. *See* HP 1008 p.7, 15, 25, 77, 84; *see* HP 1005 ¶208.
***[11.1]* at least one modules object maintaining a first list of available input, output, and process modules;**
9100C anticipates [11.1] for the same reasons [1.3], [7.1], [7.2] are anticipated by 9100C. *See* HP 1008 p.7, 30, 77; *see* HP 1005 ¶ 209.
***[11.2]* at least one program object maintaining a second list of currently selected input, output, and process modules;**
9100C anticipates [11.2] for the same reasons [1.3], [7.1], [7.2], [2.1] are anticipated by 9100C. *See* HP 1008 p.7-8, 15, 25, 30, 77, 84; *see* HP 1005 ¶ 210.
***[11.3]* at least one document object maintaining information regarding a current document being copied;**
9100C anticipates [11.3] for the same reasons [9.4] is anticipated by 9100C. *See* HP 1008 p. 8, 29, 70, 97-102; *see* HP 1005 ¶ 211
***[11.4]* at least one system management method object used to initiate, cancel, and reset said computer data management system;**
9100C anticipates [11.4] for the same reasons [9.1] is anticipated by 9100C. *See* HP 1008 p.19, 104; *see* HP 1005 ¶ 212.
***[11.5]* at least one system management event object used to provide feedback to the Client Module.**
9100C anticipates [11.5] by describing various user interface communication systems. The Control Panel Display displays "information and messages" including error codes and the activity log provides "a record of digital sender use." *See* HP 1008 p. 18, 70, 97-102; *see* HP 1005 ¶ 213.

[12.P] **12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
9100C anticipates [12.P] for the same reasons [1.P] is anticipated by 9100C. *See* HP 1008 p.7; *see* HP 1005 ¶ 214.
[12.1] **(a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
9100C anticipates [12.1] for the same reasons [1.4], [5.1] are anticipated by 9100C. *See* HP 1008 p.15, 18-19, 24-25, 77; *see* HP 1005 ¶ 215.
[12.2] **(b) a one step programming method to add paper support to electronic business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in software;**
9100C anticipates [12.2] for the same reasons [4.1] is anticipated by 9100C. *See* HP 1008 p.84; *see* HP 1005 ¶ 216.
[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
9100C anticipates [12.3] for the same reasons [5.1] is anticipated by 9100C. *See* HP 1008 p.18-19, 24-25; *see* HP 1005 ¶ 195. In addition, help functions are accessible to users as a Help key on the Control Panel. *See* HP 1008 p.19, 26; *see* HP 1005 ¶ 217.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup,**

and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;
***[13.3]* maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
***[13.4]* maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
9100C anticipates [13.P]-[13.4] for the same reasons [9.P]-[9.4] are anticipated by 9100C. *See* 1008 p.7-8, 15, 18-19, 25, 29-30, 49, 50, 70, 77, 84, 97-102, 104; *see* HP 1005 ¶ 218.
***[14.P]* 14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
***[14.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
***[14.2]* at least one processor responsively connectable to said at least one memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:**
***[14.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
***[14.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
9100C anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by 9100C. *See* HP 1008 p.7-8, 15, 25, 30, 77; *see* HP 1005 ¶ 219.
***[15.P]* 15. A computer data management system including at least one of an electronic image, graphics and document management system capable of**

transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:
***[15.1]* (a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
***[15.2]* (b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
9100C anticipates [15.P]-[15.2] for the same reasons [12.P]-[12.3] are anticipated by 9100C. *See* HP 1008 p. 15, 18-19, 24-25, 70, 77, 84, 97-102; *see* HP 1005 ¶ 220.

H. Ground 5: Claims 1-15 are anticipated under 35 U.S.C. § 102(e) by U.S. Patent 6,661,291 ("Dow," HP 1010).

The U.S Patent 6,661,291 to Dow et al. (hereinafter "Dow," HP 1010) was filed on August 7, 1998, before the effective filing date of the '381. Thus, Dow qualifies as prior art under at least 35 U.S.C. § 102(e). Dow discloses each and every limitation of claims 1-15 of the '381.

DOW ANTICIPATES THE '381
***[1.P]* 1. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
Dow anticipates [1.P] with "capturing and communicating images to other devices with communication capabilities." Dow describes an interface for viewing transmitted images or pages "on different types of computers and networks, such as the Internet." A POSA herein) would understand that "devices with

communication capabilities" require a network. *See* HP 1010, Abstract, 6:5-9, 4:61; s*ee also* HP1005 ¶258.
***[1.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
Dow anticipates [1.1] by disclosing a memory "containing the software" for automatically interfacing and communicating with another device or system. *See* HP 1010 5:50-65, 6:5-9, FIG. 2 #64; *see also* HP1005 ¶259.
***[1.2]* at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:**
Dow anticipates [1.2] by disclosing a processor in communication with a memory. The memory contains the software that is used to transmit data to other devices, per the reasons [1.1] is anticipated by Dow. *See* HP 1010 5:50-52, 5:60-65, 6:5-9, FIG. 2 #64; *see also* HP1005 ¶260.
***[1.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
Dow anticipates [1.3] by scanners used to receive electronic images from a scanned paper. *See* HP 1010 Abstract, 1:65- 2:0-2, 5:37-40, FIG. 6; *see also* HP1005 ¶261.
***[1.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
Dow anticipates [1.4] by receipt of a scanned image and third-party applications that can interact with the imaging system. *See* reasons [1.1] is anticipated by Dow. *See* HP 1010 7:59-63, 5:50-65, 6:5-9, FIG. 2 #64; *see also* HP1005 ¶262.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.
Dow anticipates [2.1] by "scanning directly to [a user's] email or PC fax applications." HP 1010 2:3-11; *see also* HP1005 ¶263.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an image using software so that the image gets seamlessly replicated and

transmitted to at least one of other devices and applications, and via the Internet.
Dow anticipates [3.1] by transmitting data over a network directly to email. *See* reasons [2.1] is anticipated by Dow. POSA would appreciate that transmitting data directly to email would include using the Internet. *See* HP 1010 2:3-11; s*ee also* HP1005 ¶264.
4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
Dow anticipates [4.1] by transmitting a scanned document via email. Nowhere in Dow is there a suggestion that any changes are needed in any of the various applications described as operating with the system. *See* HP 1010 2:3-11; *see also* HP1005 ¶265.
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables copying images between physical devices, applications, and the Internet using a single "GO" operation.
Dow anticipates [5.1] with its description of depressing a send button to transmit captured data to "another appliance, device, or system" using the communication ports of the scanning device. *See* HP 1010 4:61, 6:66-7:2; *see also* HP1005 ¶266.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
Dow anticipates [6.1] by a "capture button" that captures an electronic image in a single operation, thereby adding support for electronic or document processing. *See* HP 1010 5:37-40, FIG. 1B, #54; *see also* HP1005 ¶267.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
Dow anticipates [7.P] for the same reasons [1.2] is anticipated by Dow. *See* HP 1010 5:50-52, 5:60-65, 6:5-9, FIG. 2 #64; s*ee also* HP1005 ¶268.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a digital copier, and managing the output of the data to the third-party software application;**
Dow anticipates [7.1] for the same reasons [1.1] is anticipated by Dow. *See* HP 1010 6:5-9, FIG. 2 #64; s*ee also* HP1005 ¶269.

[7.2] **at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**
Dow anticipates [7.2] by a wide variety of functionality that enables a user to process an image. E.g., grouping images, toggling between text and image, zooming and rotating images. *See* HP 1010 5:15-20; *see also* HP1005 ¶270.
[7.3] **at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
Dow anticipates [7.3] by displaying a "thumbnail" as the paper is being scanned, and a description of the image that includes the memory location used to store the image. *See* HP 1010 6:50-55, 8:38-42, FIG. 7C. *See also* HP1005 ¶271.
8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
Dow anticipates [8.1] by using the device separately from external applications, such as the fax protocols, email, and Internet protocols. *See also* reasons [1.1] is anticipated by Dow. *See* HP 1010 FIG. 2 #64, 6:14-19; *see also* HP1005 ¶272.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
Dow anticipates [9.P] for the same reasons [1.4] is anticipated by Dow. *See* HP 1010, Abstract, 4:61, 5:50-65, 6:5-9, 7:59-63, FIG. 2 #64; *see also* HP1005 ¶273.
[9.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
Dow anticipates [9.1] by software for initializing the system upon capturing or deleting an image. POSA would recognize conventional cancel and restart options, described in the '381 as mimicking those of a conventional copier (*see* HP 1001 7:66-8:1), would include initiating, canceling, and resetting, expressly described as being counterparts to conventional copier functions. *See* HP 1010 6:42-43, FIG. 2 #76, FIG. 3, #114 and #124; *see also* HP1005 ¶274.
[9.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by**

said input, output, client, process and server modules;
Dow anticipates [9.2] with a "menu/navigation interface" that is stored in memory and the software modules associated with the interface. POSA would understand Dow to include embodiments instantiated by Windows to be stored in files maintained in a registry. *See* HP 1010 5:55-60, 7:20, 10:62, 11:6-14; FIG. 2 #104 and #64; *see also* HP1005 ¶275.
***[9.3]* maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
Dow anticipates [9.3] for the same reasons [9.2] is anticipated by Dow. Furthermore, POSA would recognize the stored files as template files. *See* HP 1010 5:55-60, 7:20, 10:62, 11:6-14; FIG. 2 #104 and #64; *see also* HP1005 ¶276.
***[9.4]* maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
Dow anticipates [9.4] for the same reasons described [9.2],[9.3] are anticipated by Dow. *See* HP 1010 5:55-60, 7:20, 10:62, 11:6-14; FIG. 2 #104 and #64; *see also* HP1005 ¶277.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
Dow anticipates [10.1] by modules and devices that communicate with one another, for the same reasons [1.3],[1.4] are anticipated by Dow. POSA would apply Dow's disclosure to a Windows operating system using corresponding Windows components, such as COM-based interfaces. *See* HP 1010 Abstract, 1:65- 2:0-2, 5:37-40, 7:59-63, 5:50-65, 6:5-9, 11:5-15, FIG. 2 #64, FIG. 6; *see also* HP1005 ¶278.
11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:
Dow anticipates [11.P] with various modules and devices that communicate with one another, for the same reasons [1.3],[1.4] are anticipated by Dow. Dow discloses other operating systems than the embodiment it details. *See* HP 1010 1:65- 2:0-2, 5:37-40, 5:50-65, 6:5-9, 7:59-63, 11:5-15, FIG. 2 #64, FIG. 6; *see also* HP1005 ¶279.
***[11.1]* at least one modules object maintaining a first list of available input, output, and process modules;**
***[11.2]* at least one program object maintaining a second list of currently**

selected input, output, and process modules;
[11.3] **at least one document object maintaining information regarding a current document being copied;**
Dow anticipates [11.1],[11.2],[11.3] for the same reasons [11.P] is anticipated by Dow. *See* HP 1010 1:65- 2:0-2, 5:37-40, 5:50-65, 6:5-9, 7:59-63, 11:5-15, FIG. 2 #64, FIG. 6; *see also* HP1005 ¶280.
[11.4] **at least one system management method object used to initiate, cancel, and reset said computer data management system;**
Dow anticipates [11.4] for the same reasons [9.1] is anticipated by Dow. *See* HP 1010 6:42-43, 11:5-15, FIG. 2 #76, FIG. 3, #114, #124; *see also* HP1005 ¶281.
[11.5] **at least one system management event object used to provide feedback to the Client Module.**
Dow anticipates [11.5] for the same reasons [11.P] is anticipated by Dow. *See* HP 1010 1:65- 2:0-2, 5:37-40, 5:50-65, 6:5-9, 7:59-63, 11:5-15, FIG. 2 #64, FIG. 6; *see also* HP1005 ¶282.
[12.P] **12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
Dow anticipates [12.P] for the same reasons [1.P] is anticipated by Dow. *See* HP 1010, Abstract, 6:5-9, 4:61; s*ee also* HP1005 ¶283.
[12.1] **(a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
Dow anticipates [12.1] for the same reasons [1.4],[5.1] are anticipated by Dow. *See* HP 1010 7:59-63, 5:50-65, 6:5-9, 4:61, 6:66-7:2, FIG. 2 #64, *See also* HP1005 ¶284.
[12.2] **(b) a one step programming method to add paper support to electronic business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in software;**
Dow anticipates [12.2] for the same reasons [4.1],[6.1] are anticipated by Dow. *See* HP 1010 2:3-11, 5:37-40, 4:61, 6:66-7:2, FIG. 1A #54; *see also* HP1005 ¶285.

[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
Dow anticipates [12.3] for the same reasons [5.1] is anticipated by Dow. Dow also discloses accessing help functions. *See* HP 1010 FIG. 2 #102, FIG. 3 #126, 5:13; *see also* HP1005 ¶286.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[13.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
[13.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
Dow anticipates [13.P]-[13.4] for the same reasons [9.P]-[9.4] are anticipated by Dow. *See* HP 1010, Abstract, 4:61, 5:50-65, 6:5-9, 6:42-43, 7:20, 7:59-63, 10:62, 11:6-14, FIG. 2 #64, FIG. 3, #114, #124; *see also* HP1005 ¶287.
[14.P] **14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
[14.1] **at least one memory storing a plurality of interface protocols for interfacing and communicating;**
[14.2] **at least one processor responsively connectable to said at least one memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of**

external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:
[14.3] **at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
[14.4] **at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
Dow anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by Dow. *See* HP 1010, Abstract, 1:65- 2:0-2, 6:5-9, 4:61, 5:37-65, 6:5-9, 7:59-63, FIG. 2 #64, *See also* HP1005 ¶288.
[15.P] **15. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
[15.1] **(a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
[15.2] **(b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
Dow anticipates [15.P]-[15.2] for the same reasons [12.P]-[12.3] are anticipated by Dow. *See* HP 1010, Abstract, 6:5-9, 4:61, 7:59-63, 5:50-65, 6:5-9, 4:61, 6:66-7:2, 2:3-11, 5:37-40, FIG. 1A #54, FIG. 2 #102, FIG. 3 #126, 5:13; *see also* HP1005 ¶289.

I. Ground 6: Claims 1-15 are anticipated under 35 U.S.C. § 102(b) by U.S. Patent 5,499,108 ("Cotte," HP 1011).

The U.S Patent 5,499,108 to Cotte et al. (hereinafter "Cotte," HP 1011) was filed in 1992, more than one year before the effective filing date of the '381. Thus, Cotte qualifies as prior art under at least 35 U.S.C. § 102(b). Cotte discloses each and every limitation of claims 1-15 of the '381.

COTTE ANTICIPATES THE '381
***[1.P]* 1. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
Cotte anticipates [1.P] with a system "having an input device …[used to] scan images or text into a computer and automatically do something with the image" such as fax or email it. A POSA would understand that sending an email message would include use of a network. *See* HP 1011 1:37-42, 10:40-55, FIG. 17; s*ee* HP 1005 ¶291.
***[1.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
Cotte anticipates [1.1] with software stored in memory used for communicating with, for example, a fax protocol. *See* HP 1011 8:37-55, 8:39-55, FIG. 11A #132 and #352; s*ee* HP 1005 ¶292.
***[1.2]* at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:**
Cotte anticipates [1.2] with a processor in communication with the memory in both the host computer and the input device. *See* HP 1011 8:39-55, 10:32-55, FIG. 11A #352; s*ee* HP 1005 ¶293.
***[1.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
Cotte anticipates [1.3] with a scanner that receives data from a scanned

document, which can be paper. *See* HP 1011 8:13-15, FIG. 10 #114; s*ee* HP 1005 ¶294.
***[1.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
Cotte anticipates [1.4] with a module in communication with an input module. Upon receiving a scanned image, Cotte uses other modules to, for example, attach a scanned image to a clipboard, an email, or send it as a fax. *See* HP 1011 10:43-53, FIG. 17; s*ee* HP 1005 ¶295.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.
Cotte anticipates [2.1] because discloses transmitting data to a fax modem and a remote fax machine, and sending scanned data to a printer. *See* reasons [1.P] is anticipated by Cotte. *See* HP 1011 1:37-42, 8:22-23, 10:40-55, FIG. 10 #120, FIG. 11A #118, FIG. 17, FIG. 23 #328; s*ee* HP 1005 ¶296.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an image using software so that the image gets seamlessly replicated and transmitted to at least one of other devices and applications, and via the Internet.
Cotte anticipates [3.1] for the same reasons [1.P] is anticipated by Cotte. *See* HP 1011 1:37-42, 10:40-55, FIG. 10 #114, FIG. 17; s*ee* HP 1005 ¶297.
4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
Cotte anticipates [4.1] by transmitting data directly, for the same reasons [1.4],[2.1], [3.1] are anticipated by Cotte. *See* HP 1011 1:37-42, 8:22-23, 10:40-55, 21:5-12, FIG. 10 #120, FIG. 11A #118, FIG. 17, FIG. 23 #328; s*ee* HP 1005 ¶298.
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables copying images between physical devices, applications, and the Internet using a single "GO" operation.
Cotte anticipates claim [5.1] because Cotte discloses an interface for selecting to/from devices using a single function. Cotte also discloses "a drop down menu presenting options to the user regarding what should be done with the scanned

image." *See* HP 1011 2:59-60, 10:43-55, FIG. 17, FIG. 21B #296; s*ee* HP 1005 ¶299.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
Cotte anticipates [6.1] by adding support for electronic or document processing via scanning, printing, and sending to a host computer a document, by pressing a copy button, which is "a single programming step." *See* HP 1011 19:40-52, 20:43-52, 20:55-60, FIG. 17; s*ee* HP 1005 ¶300.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
Cotte anticipates [7.P] for the same reasons [1.1] is anticipated by Cotte. *See* HP 1011 8:37-55, FIG. 11A #132, #352; s*ee* HP 1005 ¶301.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a digital copier, and managing the output of the data to the third-party software application;**
Cotte anticipates [7.1] by managing an input scanner to receive data that is faxed to another computer or system. Software output modules embodied in hardware of Cotte are also used to communicate data to various external devices, such as sending scanned data to a printer. *See* HP 1011 18:52-55, 8:38-55, FIG. 10, FIG. 11A #352, 8:39-55, 23:15-18, FIG. 23 #328, 10:49-50; s*ee* HP 1005 ¶302.
***[7.2]* at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**
Cotte anticipates [7.2] by changing the gray scale of pixels in the scanned data, and processing a paper document during scanning according to instructions written on the document. *See* HP 1011 13:7-40, 16:25-33, 17:4-10, FIGS. 14-16, FIG. 18 #264, FIG. 21A #288; s*ee* HP 1005 ¶303.
***[7.3]* at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
Cotte anticipates [7.3] by displaying "incoming data," optionally in a pop-up window. *See* HP 1011 18:50-55, 16:60-66; s*ee* HP 1005 ¶304.

8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
Cotte anticipates [8.1] by input device software that resides on a host computer and instructs the host software as to the processing to be performed on the incoming document. Cotte also dislcoses displaying document options using a pop-up window, *See* HP 1011 10:60-11:5,18:46-51; *see* HP 1005 ¶305.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
Cotte anticipates [9.P] for the same reasons [1.4] is anticipated by Cotte. *See* HP 1011 10:43-53, FIG. 17; *see* HP 1005 ¶306.
***[9.1]* enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
Cotte anticipates [9.1] by launching the system (i.e., "initiating") upon a document scanning. The system also determines whether a timeout has occurred ("canceling"). *See* HP 1011 20:34, 20:38-39, FIG. 13A, FIG. 23; s*ee* HP 1005 ¶307.
***[9.2]* maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
Cotte anticipates [9.2] by generating a menu of options by referencing a hard disk (used at startup of a copier) and RAM (used during operation of a copier) to "determine what software packages are resident." POSA would understand the information used to generate the menu of options would be stored in files that, in a Windows implementation, would be maintained in a registry. *See* HP 1011 15:36-42, 18:43-51, 22:53-61; *see also* HP 1001 7:66-8:1. *See* HP 1005 ¶308.
***[9.3]* maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
***[9.4]* maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
Cotte anticipates [9.3],[9.4] for the same reasons [9.2] is anticipated by Cotte. Furthermore, POSA would recognize the stored files as template files. *See* HP

1011 15:36-42, 18:43-51, 22:53-61; *see also* HP 1001 7:66-8:1. *See* HP 1005 ¶309-310.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
Cotte anticipates [10.1] by modules and devices that communicate, for the same reasons described above in conjunction with [1.3],[1.4]. Cotte contemplates applications in non-Mac operating systems; POSA would apply Cotte's disclosure to a Windows OS using corresponding components, such as COM-based interfaces. *See* HP 1010 1:24, 2:8, 23:19-22; 8:13-15, FIG. 10 #114; 10:43-53, FIG. 17; *see* HP 1005 ¶311.
11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:
Cotte anticipates [11.P] for the same reasons [10.1] is anticipated by Cottee as above. *See* HP 1010 1:24, 2:8, 23:19-22; 8:13-15, FIG. 10 #114; 10:43-53, FIG. 17; *see* HP 1005 ¶312.
***[11.1]* at least one modules object maintaining a first list of available input, output, and process modules;**
***[11.2]* at least one program object maintaining a second list of currently selected input, output, and process modules;**
***[11.3]* at least one document object maintaining information regarding a current document being copied;**
Cotte anticipates [11.1]-[11.3] for the same reasons [11.P] is anticipated by Cotte. *See* HP 1010 1:24, 2:8, 23:19-22; 8:13-15, 10:43-53, FIG. 10 #114; FIG. 17; *see* HP 1005 ¶313.
***[11.4]* at least one system management method object used to initiate, cancel, and reset said computer data management system;**
Cotte anticipates [11.4] for the same reasons [9.1] is anticipated by Cotte. *See* HP 1011 20:34, 20:38-39, FIG. 13A, FIG. 23; *see* HP 1005 ¶314.
***[11.5]* at least one system management event object used to provide feedback to the Client Module.**
Cotte anticipates [11.5] for the same reasons [11.P] is anticipated by Cotte. *See* HP 1010 1:24, 2:8, 23:19-22; 8:13-15, 10:43-53, FIG. 10 #114, FIG. 17; *see* HP 1005 ¶315.
***[12.P]* 12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or**

more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:
Cotte anticipates [12.P] for the same reasons [1.P] is anticipated by Cotte. *See* HP 1011 1:37-42, 10:40-55, FIG. 17; *see* HP 1005 ¶316.
[12.1] **(a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
Cotte anticipates [12.1] for the same reasons [5.1] is anticipated by Cotte. *See* HP 1011 2:59-60, 10:43-55, FIG. 17, FIG. 21B #296; *see* HP 1005 ¶317.
[12.2] **(b) a one step programming method to add paper support to electronic business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in software;**
Cotte anticipates [12.2] for the same reasons [4.1] is anticipated by Cotte. *See* HP 1011 FIG. 17, 21:5-12; *see* HP 1005 ¶318.
[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
Cotte anticipates [12.3] for the same reasons [5.1] is anticipated by Cotte. POSA would recognize that software implementing a user interface would include a help function. *See* HP 1011 2:59-60, 10:43-55, FIG. 17, FIG. 21B #296; *see* HP 1005 ¶319.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[13.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer**

data management system copy operation in a program object, and saving the currently active modules in a process template file; and
***[13.4]* maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
Cotte anticipates [13.P]-[13.4] for the same reasons [9.P]-[9.4] are anticipated by Cotte. *See* HP 1011, 10:43-53, 20:34, 20:38-39, FIG. 13A, FIG. 17, FIG. 23; *see* HP 1005 ¶320.
***[14.P]* 14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
***[14.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
***[14.2]* at least one processor responsively connectable to said at least one memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:**
***[14.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
***[14.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
Cotte anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by Cotte. *See* HP 1011 1:37-42, 8:13-15,10:40-55, 8:37-55, 8:39-55, FIG. 10 #114, FIG. 11A #132, #352, FIG. 17; s*ee* HP 1005 ¶321;
***[15.P]* 15. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least**

one of locally and via the Internet, wherein the system comprises:
[15.1] **(a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
[15.2] **(b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
Cotte anticipates [15.P]-[15.2] for the same reasons [12.P]-[12.3] are anticipated by Cotte. *See* HP 1011 1:37-42, 2:59-60, 10:40-55, 21:5-12, FIG. 17, FIG. 21B #296; *see* HP 1005 ¶322.

J. Ground 7: Claims 1-4, 6, 8, 10, & 14 are anticipated under 35 U.S.C. § 102(b) by HP ScanJet 5 Press Release ("SJ5PR," HP 1015).

The HP ScanJet 5 Press Release, titled "HP Introduces Next-Generation Network Scanner" (hereinafter "SJ5PR," HP 1015) was published in 1997, more than one year before the effective filing date of the '381. Thus, SJ5PR qualifies as prior art under at least 35 U.S.C. § 102(b). SJ5PR discloses each and every limitation of claims 1-4, 6, 8, 10, & 14 of the '381.

SJ5PR ANTICIPATES CLAIMS 1-4, 6, 8, 10, & 14 of the '381
[1.P] **1. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:**
SJ5PR anticipates [1.P] by that it "enables users to scan paper-based documents, convert them to electronic form and send them from the control panel directly to one or more recipients simultaneously… directly to their own desktop PCs[, as well as] stored, redistributed, printed or integrated and edited within standard business applications." HP 1015 p.2 ¶1; *see* HP 1005 ¶325.

[1.1] **at least one memory storing a plurality of interface protocols for interfacing and communicating;**
SJ5PR anticipates [1.1] by storing user-created distribution lists, personalized scanning preferences, and selection of preferred inboxes, each of which would have corresponding interface protocols, as well as buffering. *See* HP 1015 p. 2 ¶7, p.3 ¶4, 6, p.4 ¶2-4, 7, p.5 ¶3; *see also* HP 1005 ¶326.
[1.2] **at least one processor responsively connectable to said at least one memory, and implementing the plurality of interface protocols as a software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said software application comprises at least one of:**
SJ5PR anticipates [1.2] via various processing described: compression, buffering, and OCR, *e.g.*, to "minimize[] the scanning-process time," each of which would be understood by a POSA to indicate such a processor. *See* HP 1015 p.4 ¶2-3, p.5 ¶3-4; *see also* HP 1005 ¶327.
[1.3] **at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
SJ5PR anticipates [1.3] by a scanner (with a flatbed and automatic document feeder) for scanning paper-based documents, converting them to electronic form, and sending them from the control panel directly. *See* HP 1015 p.2 ¶1, p.3 ¶7, p.5 ¶1-2; *see also* HP 1005 ¶328.
[1.4] **at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
SJ5PR anticipates [1.4] by "[o]nce in digital form, the information can be stored, redistributed, printed or integrated and edited within standard business applications," and automatically link the documents into a user's preferred application." *See* HP 1015 p.2 ¶1, p.4 ¶2; *see also* HP 1005 ¶329.
2. A computer data management system according to claim 1, *[2.1]* wherein the one or more of the external devices and applications include a printer, a facsimile, and a scanner.
SJ5PR anticipates [2.1] by transmitting data to printers or fax machines. *See* HP 1015 p.3 ¶2, 7, p.4 ¶5; *see also* HP 1005 ¶330.
3. A computer data management system according to claim 1, *[3.1]* wherein the computer data management system includes the capability to integrate an

image using software so that the image gets seamlessly replicated and transmitted to at least one of other devices and applications, and via the Internet.
SJ5PR anticipates [3.1] by allowing users to transmit data to destinations including email addresses, devices (see [2.1] above), and applications. *See* HP 1015 p.3 ¶2, 5-7, p.4 ¶2, 5; *see also* HP 1005 ¶331.
4. A computer data management system according to claim 1, *[4.1]* wherein the computer data management system includes the capability to integrate the electronic images into a destination application without the need to modify the destination application.
SJ5PR anticipates [4.1] by its Automatic Workflow process, which "describes the ability to receive scanned documents and automatically link them directly into a user's preferred application." There is no need to modify the destination application. *See* HP 1015 p.4 ¶2, 6-7; *see also* HP 1005 ¶332.
6. A computer data management system according to claim 1, *[6.1]* wherein the computer data management system includes the capability of adding at least one of electronic document and paper processing with a single programming step.
SJ5PR anticipates [6.1] by: "users can specify that scanned documents automatically link with a word processing application, passing directly through an optical character recognition (OCR) engine," which corresponds to a single programming step. HP 1015 p.4 ¶2; *see also* HP 1005 ¶333.
8. A computer data management system according to claim 1, *[8.1]* wherein the one or more of the external devices and applications integrates the computer data management system into an external application via one of running the computer data management system, as an external service and embedding the computer data management system as an embedded service.
SJ5PR anticipates [8.1] by disclosure of end-user PaperPort software, which can be installed on a user's computer or on a network location. *See* HP 1015 p.1 ¶2, p.3 ¶3; *see also* HP 1005 ¶334.
10. A computer data management system according to claim 7, *[10.1]* wherein the server module includes at least one server module application programmer interface (API).
SJ5PR anticipates [10.0] by operating system support including Microsoft Windows and communications among devices and applications using standard Windows facilities. *See* HP 1015 p.3 ¶1-2, p.5 ¶2; *see also* HP 1005 ¶335.
***[14.P]* 14. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and**

electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, comprising:
***[14.1]* at least one memory storing a plurality of interface protocols for interfacing and communicating;**
***[14.2]* at least one processor responsively connectable to said at least one memory, and implementing at least one interface protocol as at least one software application for interfacing and communicating with the plurality of external destinations including the one or more of the external devices and applications, wherein said at least one software application comprises at least one of:**
***[14.3]* at least one input module managing data comprising at least one of paper and electronic paper input to the computer data management system, and managing at least one imaging device to input the data through at least one of a scanner and a digital copier, and managing the electronic paper from at least one third-party software applications; and**
***[14.4]* at least one module communicable with said at least one input, output, client, and process modules and external applications, and capable of dynamically combining the external applications with at least one of digital capturing devices and digital imaging devices.**
SJ5PR anticipates [14.P]-[14.4] for the same reasons [1.P]-[1.4] are anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.3 ¶4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; *see also* HP 1005 ¶336.

K. Ground 8: Claims 5, 7, 9, 11-13, & 15 are obvious under 35 U.S.C. § 103(a) by HP ScanJet 5 Press Release ("SJ5PR," HP 1015) in view of HP ScanJet 5 Scanner User's Guide ("SJ5," HP 1006).

As detailed in Grounds 1 and 7 above, HP ScanJet 5 Press Release ("SJ5PR," HP 1015) and HP ScanJet 5 Scanner User's Guide ("SJ5") were published in 1997, before the effective filing date of the '381. Thus, SJ5PR and SJ5 qualify as prior art under at least 35 U.S.C. § 103(a). SJ5PR and SJ5 disclose each and every limitation of claims 5, 7, 9, 11-13, & 15 of the '381.

SJ5PR IN VIEW OF SJ5 MAKES OBVIOUS CLAIMS 5, 7, 9, 11, 12, 13, 15
[0.0] Introduction to claims 5, 7, 9, and 11.
Claims 5, 7, 9, and 11 below depend on claim 1. SJ5PR anticipates claim 1 for the reasons articulated above regarding [1.P]-[1.4]. *See* HP 1015 p.2 ¶1, p.3 ¶4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; *see also* HP 1005 ¶338. -- The portions of claims 5, 7, 9, and 11 not disclosed in SJ5PR are shown below to be disclosed in SJ5. SJ5PR and SJ5 are press release and product documentation for the same product, the HP ScanJet 5. Thus, a POSA would have been motivated to combine elements from SJ5 with SJ5PR, as they would have been merely a "[s]imple substitution of one known element for another to obtain predictable results," and "[a]pplying a known technique to a known device (method, or product) ready for improvement to yield predictable results." MPEP § 2141 III.(D).
5. A computer data management system according to claim 1, *[5.1]* wherein the computer data management system includes an interface that enables copying images between physical devices, applications, and the Internet using a single "GO" operation.
SJ5 discloses [5.1] because it includes an interface that enables a user to send data from the scanner to an application, fax machine, or Internet e-mail address, by pressing a Go key. *See* HP 1006 p.15, 18; FIG. 1. It would be obvious to POSA to combine the disclosures of SJ5PR and SJ5 as discussed above in [0.0]. *See* HP 1015 p.2 ¶1, p.3 ¶4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1005 ¶340.
7. A computer data management system according to claim 1, *[7.P]* wherein the software application comprises:
SJ5PR discloses [7.P] by disclosure of the HP Network ScanJet 5 Utility software and PaperPort software. *See* HP 1015 p.3 ¶3-4; *see* HP 1005 ¶341-342.
***[7.1]* at least one output module managing the data output from the computer data management system, managing at least one imaging device to output the data to at least one of a standard Windows printer, an image printer, and a digital copier, and managing the output of the data to the third-party software application;**
SJ5PR discloses [7.1] for the same reasons [1.1], [1.2], [1.4], [2.1] is anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.3 ¶2, 4, 6-7, p.4 ¶2-5, p.5 ¶3-4; see also HP 1005 ¶343.
***[7.2]* at least one process module applying at least one data processing to the data comprising the at least one of the paper and the electronic paper as it is being copied, applying additional functionality including at least one of workflow and processing functionality to the data comprising the at least one of paper and electronic paper as it is being copied, and applying multiple processes to a single virtual copy; and**

SJ5PR discloses [7.2] for the same reasons [6.1] is anticipated by SJ5PR. *See* HP 1015 p.4 ¶2; *see also* HP 1005 ¶343.
***[7.3]* at least one client module presenting the data comprising the at least one of paper and electronic paper as it is being copied, and information related to at least one of the input and output functions.**
SJ5 discloses [7.3] by SJ5's PaperPort software displaying an image of scanned pages as pages are scanned; in addition it displays status information that includes error messages. *See* HP 1006 p.28, 48, FIG. 13. It would be obvious to POSA to combine the disclosures of SJ5PR and SJ5 as discussed above in [0.0]. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1005 ¶344-345.
9. A computer data management system according to claim 7, *[9.P]* wherein the server module includes:
SJ5PR anticipates [9.P] for the same reasons [1.4] is anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.4 ¶2; *see also* HP 1005 ¶346.
***[9.1]* enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
SJ5 discloses [9.1] by a control panel that includes a GO button to initiate a scan & an Abort button to cancel and reset, which require corresponding underlying software. Power cycling is a reset technique. *See* HP 1006 p.15, 21, 28, 100, FIG. 1. *See also* HP 1005 ¶347-348. -- It would be obvious to POSA to combine the disclosures of SJ5PR and SJ5 as discussed above in [0.0]. *See* HP 1015 p.2 ¶1, p.3 ¶4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1005 ¶347-348.
***[9.2]* maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
SJ5PR anticipates [9.2] by operating system support including Microsoft Windows and communications among devices and applications using standard Windows facilities. *See* HP 1015 p.3 ¶1-2, 4, p.5 ¶2; *see also* HP 1005 ¶349.
***[9.3]* maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
***[9.4]* maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
SJ5PR anticipates [9.3]-[9.4] for the same reasons [9.2] is anticipated by SJ5PR. *See* HP 1015 p.3 ¶1-2, 4, p.5 ¶2; *see also* HP 1005 ¶350-351.

11. A computer data management system according to claim 10, *[11.P]* wherein the at least one server module application programmer interface (API) comprises the following COM-based interfaces:
***[11.1]* at least one modules object maintaining a first list of available input, output, and process modules;**
***[11.2]* at least one program object maintaining a second list of currently selected input, output, and process modules;**
***[11.3]* at least one document object maintaining information regarding a current document being copied;**
***[11.4]* at least one system management method object used to initiate, cancel, and reset said computer data management system;**
SJ5PR & SJ5 make obvious[11.1]- [11.4] for the same reasons [9.1] is made obvious by SJ5PR & SJ5. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1006 p.15, 100, FIG. 1; *see also* HP 1005 ¶352-353.
***[11.5]* at least one system management event object used to provide feedback to the Client Module.**
SJ5PR & SJ5 make obvious [11.5] for the same reasons [7.3] is made obvious by SJ5PR & SJ5. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1006 p.28, 48. FIG. 13; *see also* HP 1005 ¶354.
***[12.P]* 12. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**
SJ5PR anticipates [12.P] for the same reasons [1.P] is anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.4 ¶2; *see also* HP 1005 ¶355.
***[12.1]* (a) single function copy operation linking devices, applications and the internet including at least one a go operation, a single function paper copy between devices and software applications, and a single function paper copy between software applications and devices;**
SJ5PR anticipates [12.1] for the same reasons [1.4] is anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.4 ¶2; *see also* HP 1005 ¶356.
***[12.2]* (b) a one step programming method to add paper support to electronic business processes including at least one of a one step method of supporting paper within electronic business process application optionally including legacy systems with no or minimal reprogramming of the electronic business process application, a method of recreating a module oriented copier in software;**

SJ5PR anticipates [12.2] for the same reasons [4.1] is anticipated by SJ5PR. *See* HP 1015 p.4 ¶2, 6-7; *see also* HP 1005 ¶357.
[12.3] **(c) a copier interface implemented as software application including at least one of a virtual copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, in a substantially single step, and presenting users with direct access to at least one of tutorial and options from a main application window.**
SJ5PR & SJ5 make obvious [12.3] for the same reasons [5.1] is made obvious by SJ5PR & SJ5. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1006 p.15, 18. SJ5 also discloses accessing help functions, which are accessible to users as a Help menu in the PaperPort software. *See* HP 1006 p.48. *See* HP 1005 ¶358.
[13.P] **13. A computer data management system including a server module comprising:**
[13.1] **enable virtual copy operation means for initiating, canceling, and resetting said computer data management system;**
[13.2] **maintain list of available module means for maintaining a registry containing a list of said input, output, and process modules that can be used in said computer data management system, said list being read on startup, and maintaining another copy of said list in a modules object accessible by said input, output, client, process and server modules;**
[13.3] **maintain currently active modules means for maintaining said input, output, and process modules currently being used for a current computer data management system copy operation in a program object, and saving the currently active modules in a process template file; and**
[13.4] **maintain complete document information means for maintaining information regarding a current file being copied, and saving the information in a document template file.**
SJ5PR anticipates [13.P], [13.2]-[13.4] for the same reasons [9.P], [9.2]-[9.4] are anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; *see also* HP 1005 ¶346-351.- SJ5PR & SJ5 make obvious [13.1] for the reasons [9.1] is made obvious by SJ5PR & SJ5. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1006 p.15, 21, 28, 100, FIG. 1; *see also* HP 1005 ¶359.
[15.P] **15. A computer data management system including at least one of an electronic image, graphics and document management system capable of transmitting at least one of an electronic image, electronic graphics and electronic document to a plurality of external destinations including one or more of external devices and applications responsively connectable at least one of locally and via the Internet, wherein the system comprises:**

[15.1] **(a) single function copy operation linking devices, applications and the internet including at least one of a function paper copy between devices and software applications, and a function paper copy between software applications and devices; and**
[15.2] **(b) a copier interface implemented as software application including at least one of a copier interface method of presenting to a user an operation of at least one of copying files and electronic images, at least one of to and from, at least one of digital imaging devices and software applications, and presenting users with direct access to at least one of tutorial and options from an application window.**
SJ5PR anticipates [15.P], [15.1] for the same reasons [12.P]-[12.2] are anticipated by SJ5PR. *See* HP 1015 p.2 ¶1, p.4 ¶2, 6-7; *see also* HP 1005 ¶355-357. -- SJ5PR & SJ5 make obvious [12.3] for the same reasons [5.1] is made obvious by SJ5PR & SJ5. *See* HP 1015 p.2 ¶1, p.3 ¶1-2, 4, 6, 7, p.4 ¶2-4, p.5 ¶1-4; HP 1006 p.15, 18, 48; *see also* HP 1005 ¶360.

V. Conclusion

For the reasons given above, *Inter Partes* review under 35 U.S.C. § 311 and 37 C.F.R. § 42.101 of United States Patent No. 6,771,381 to Klein, titled "Distributed Architecture and Process for Virtual Copying" is hereby requested.

Respectfully submitted,

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