

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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**CONOPCO, INC. d/b/a UNILEVER**  
**Petitioner**

**v.**

**THE PROCTER & GAMBLE COMPANY**  
**Patent Owner**

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**Case IPR2013-00505**  
**Patent 6,974,569**

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**PATENT OWNER'S NOTICE OF APPEAL**

**Mail Stop "PATENT BOARD"**  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 90.2(a), notice is hereby given that Patent Owner, The Procter & Gamble Company (“P&G”) appeals to the United States Court of Appeals for the Federal Circuit from the Final Written Decision of the Patent Trial and Appeal Board (“PTAB”) entered on February 10, 2015 (Paper 69), and from all underlying orders, decisions, rulings and opinions, including, without limitation the Decision on Institution of *Inter Partes* Review entered on February 12, 2014 (Paper 9).

In accordance with 37 C.F.R. § 90.2(a)(3)(ii), P&G states that the issues on appeal include, but are not limited to: (1) the PTAB’s determination that claims 1-12, 15, 17-19, 23, 26, 28-30, and 32 of U.S. Patent No. 6,974,569 (“the ’569 patent”) are unpatentable under 35 U.S.C. § 103; (2) the PTAB’s claim constructions, including its construction of the index value claim terms of the ’569 patent; (3) the PTAB’s determination and application of the knowledge and level of skill of a person of ordinary skill in the art; (4) the PTAB’s reliance on and failure to exclude new evidence and arguments submitted by Petitioner for the first time in its Reply; (5) the PTAB’s determination to credit the testimony of Petitioner’s witness over that of P&G’s witnesses; (6) the PTAB’s determinations on P&G’s evidence of secondary considerations; and (7) any finding or determination supporting or relating to those issues, as well as all other issues decided adversely to P&G in any orders, decisions, rulings and opinions.

This Notice of Appeal is being filed with the PTAB and with the Clerk's  
Office for the United States Court of Appeals for the Federal Circuit.

Dated: April 7, 2015

Respectfully submitted,

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**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that, in addition to being filed and served electronically through the PTAB's PRPS System, the foregoing PATENT OWNER'S NOTICE OF APPEAL was filed and served by hand on this 7th day of April, 2015, with the Director of the United States Patent and Trademark Office, at the following address:

Director of the United States Patent and Trademark Office  
c/o Office of the General Counsel  
Madison Building East, 10B20  
600 Dulany Street  
Alexandria, VA 22314-5793

I also hereby certify that three (3) true and correct copies of the foregoing PATENT OWNER'S NOTICE OF APPEAL were filed by hand on this 7th day of April, 2015, with the Clerk's Office of the United States Court of Appeals for the Federal Circuit, at the following address:

United States Court of Appeals for the Federal Circuit  
717 Madison Place, N.W., Suite 401  
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I further hereby certify that on this 7th day of April, 2015, a true and correct copy of the foregoing Patent Owner's Notice of Appeal, was served by email, pursuant to agreement of the Parties, on the following:

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