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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LKQ CORPORATION
Petitioner

v.

Patent of CLEARLAMP, LLC
Patent Owner

Case No. IPR2013-00020
Patent 7,297,364

**PATENT OWNER'S RESPONSE TO PETITIONERS' OBSERVATIONS
ON TESTIMONY OF MR. A. HARVEY BELL IV**

Patent Owner Clearlamp, LLC hereby responds to Petitioner LKQ Corporation's "Observations on Testimony of Mr. A. Harvey Bell IV" (Paper No. 61, submitted November 19, 2013).

Each of LKQ's 11 enumerated observations are based on testimony that LKQ elicited from Professor A. Harvey Bell, IV (one of Clearlamp's technical experts) during Mr. Bell's second deposition in this proceeding. *See* Ex. 1034 (deposition transcript on which LKQ's observations are based). After Clearlamp cited to Mr. Bell's declaration (Ex. 2004) in its reply brief on its motion to amend, the Board granted LKQ leave to re-depose Mr. Bell, but only on paragraphs 54, 55, and 79 of his declaration. *See* Order dated Nov. 6, 2013 (Paper No. 56).

Clearlamp notes that LKQ's observations are not geared towards Clearlamp's motion to amend, or LKQ's response thereto. Instead, they track the arguments LKQ makes in support of its motion to exclude portions of Mr. Bell's declaration concerning testing reflected in paragraphs 54 and 55 of Mr. Bell's declaration.

Compare LKQ's Motion to Exclude (Paper No. 58) at 2–3 and LKQ's Observations (Paper No. 61) at 1–9.

Dated: December 3, 2013

Respectfully submitted by

/Matthew L. Cutler/

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CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (e)(4)

It is hereby certified that on this 3rd day of December, 2013, a copy of the foregoing document was served via electronic mail upon the following:

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