UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

XILINX, INC. Petitioner

v.

INTELLECTUAL VENTURES I LLC Patent Owner

> Case IPR2013-00029 Patent 5,632,545

INTELLECTUAL VENTURES' PATENT OWNER MOTION TO AMEND

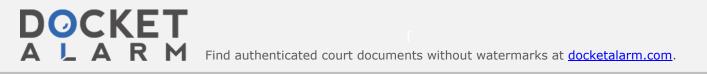


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Table of Authorities

Cases

Idle Free v. Bergstrom	, IPR2012-00027
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Regulations

37 C.F.R. § 42.121	1,	3
37 C.F.R. § 42.22	••••	.1

I. INTRODUCTION

Patent owner Intellectual Ventures I LLC moves pursuant to 35 U.S.C. § 316 and 37 C.F.R. § 42.121 to cancel Claim 2 and to substitute Claim 4 in its place, contingent on Claim 2 being found unpatentable by the Board, and similarly to cancel 3 and to substitute Claim 5 in its place, contingent on Claim 3 being found unpatentable by the Board.

Patent owner submits that Claims 4 and 5 do not introduce new subject matter and that each of Claims 4 and 5 is fully supported by the originally filed specification of U.S. Patent No. 5,632,545 ("the '545 patent") as discussed in the written description support section below. Also, Claims 4 and 5 do not enlarge the scope of the patent claims; each includes the subject matter of the claim for which it substitutes. Patent owner submits that this motion fully complies with 37 C.F.R. §§ 42.22 and 42.121.

II. CLAIM LISTING

- 2. (Canceled)
- 3. (Canceled)

4. (Proposed substitute for Claim 2) The video projection projector system of claim 1 wherein the light-shutter matrices are monochrome LCD arrays, and wherein the video projector system further comprises:

a heat containment system, wherein the heat containment system comprises an enclosure that isolates components in the heat containment system from other components of the video projector system, and wherein the heat containment system includes:

the individual light sources;

<u>heat filter glass adapted to filter heat from the separate light beams as</u> <u>the separate light beams pass through the heat filter glass and exit the heat</u> <u>containment system; and</u>

<u>a fan in communication with an outside environment, wherein the fan</u> <u>is adapted to force heat generated by the individual light sources and heat filtered</u> <u>by the heat filter glass into the outside environment;</u>

<u>a second controller adapted to control the individual light sources and the</u> <u>fan; and</u>

<u>a control link adapted to connect the video controller to the second controller</u> <u>to provide individualized variable control of each of the individual light sources</u>.

5. (Proposed substitute for Claim 3) The video projector system of claim 1 wherein three light sources provide three beams, and red, green, and blue filters are used to provide red, green, and blue beams to an LCD matrix system, and wherein the video projector system further comprises:

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