

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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XILINX, INC.  
Petitioner

v.

INTELLECTUAL VENTURES I LLC  
Patent Owner

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Case IPR2013-00029  
Patent 5,632,545

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INTELLECTUAL VENTURES' PATENT OWNER RESPONSE PURSUANT  
TO 37 C.F.R. § 42.120

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**I. INTRODUCTION**

The petitioner Xilinx, Inc. (hereinafter “Xilinx”) initiated the present *inter partes* review proceeding on October 19, 2012 by filing a petition for *inter partes* review. In its petition, Xilinx argued that the claims of U.S. Patent No. 5,632,545 (hereinafter “the ‘545 patent”) are unpatentable on four different grounds. On January 23, 2013, patent owner filed a patent owner preliminary response in response to Xilinx’s petition. In the patent owner preliminary response, patent owner argued that the references relied upon in Xilinx’s petition fail to disclose or suggest several elements required by the claims of the ‘545 patent. Upon consideration of Xilinx’s petition and the patent owner preliminary response, the Patent Trial and Appeal Board (hereinafter “the Board”) issued a decision on March 12, 2013. In its decision, the Board granted Xilinx’s petition in part, thereby allowing the *inter partes* review to proceed to trial.

Both the petition filed by Xilinx and the decision by the Board rely on the declaration of Dr. Buckman. Whatever may be Dr. Buckman’s amount of knowledge in the field of optics generally, it became apparent during Dr. Buckman’s deposition that he has less experience in the field of video projector systems. At page 27, lines 1-2 of the deposition transcript (Ex. 2004), Dr. Buckman acknowledged that he has never “designed a projection system.” Dr.

Buckman also acknowledged that his curriculum vitae nowhere mentions the terms “liquid crystal” or “video projection display” (deposition transcript at p. 8, line 24 – p. 9, line 6) and that he has never testified in a legal proceeding about liquid crystal displays (deposition transcript at 9, lines 7-10). As discussed herein, patent owner submits that several of the assertions made by Dr. Buckman in his declaration are inaccurate or simply incorrect.

The present response explains in detail why Claims 1-3 of the ‘545 patent are patentable in view of the challenges proposed by Xilinx in its petition. Specifically, the present response discusses how the applied references fail to disclose or suggest at least the claimed “light-shutter matrix system comprising a number of equivalent switching matrices,” “video controller adapted for controlling the light-shutter matrices,” and “lens system in the path of the separate light beams” in a manner that renders the claims of the ‘545 patent unpatentable. For the reasons discussed herein, patent owner submits that Claims 1-3 of the ‘545 patent are patentable and requests that the Board issue a final decision to that effect.

## **II. OVERVIEW OF U.S. PATENT NO. 5,632,545**

The ‘545 patent is directed to a “color video projector system” with “separate light sources for producing separate beams of light which are passed

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