UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

PNY Technologies, Inc. Petitioner

v.

Phison Electronics Corp. Patent Owner

Case IPR2013-00472 Patent 7,518,879

PATENT OWNER PHISON ELECTRONICS CORP.'S RESPONSE UNDER 37 C.F.R § 42.120

DOCKET

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1. Ground 1 is defective because neither the protrusions described in Takahashi nor the stand-offs described in Minneman are concave according to the broadest reasonable interpretation of the term
2. Ground 1 is also defective because Takahashi is not analogous art to the Challenged Claims
3. Ground 1 is also defective because the curved shape of the claimed concave props provides multiple functional advantages, and thus is not an obvious design choice

	4. Ground 1 is also defective because Minneman does not teach "said PCBA is fixed by means of pressing of said plurality of concave props" as recited in the claims
	5. Ground 1 is also defective because Minneman does not teach "a housing havinga plurality of concave props" as recited in the claims
В	Grounds Based on Elbaz
	1. Grounds 2 and 3 are defective because the combination of Elbaz and Deng or of Elbaz, Deng and AAPA does not teach or suggest that the "PCBA is fixed" by the concave props
	2. Grounds 2 and 3 are also defective because the combination of Elbaz and Deng or of Elbaz, Deng and AAPA does not teach or suggest the "said PCBA is fixed by means of pressing of said plurality of concave props."
	3. Grounds 2 and 3 also are defective because Elbaz teaches away from a combination including a PCBA
	4. Ground 2 is also defective because the combination of Elbaz and Deng does not teach or suggest "a LED module having a LED indicator disposed in said housing" or the components recited in claims 3, 11, and 20
VI.	CONCLUSION

Exhibit No.	Description
2001	File History of the '879 Patent
2002	U.S. Publication No. 2007/0178769 to Ni ("Ni Publication")
2003	Collins English Dictionary, pp. 350, 452, 725 (2005)
2004	Erik Oberg et al., <i>Machinery's Handbook</i> , 26 th Edition, pp. 720- 973 (2000)
2005	Liberty Mutual Ins. Co. v. Progressive Casualty Ins. Co., CBM2013-00003 (Paper 7, Oct. 25, 2012)
2006	DETENTS & DIAMETERS OF SPRING LOADED DEVICES, http://www.vlier.com/product_index/sld/ sel_06_diam.html (2007)
2007	Affidavit of David M. Barkan In Support of Patent Owner's Motion for Pro Hac Vice Admission
2008	Steve Visser - Declaration
2009	Steve Visser - Curriculum Vitae
2010	Webster New World Dictionary – "concave"
2011	American Heritage Dictionary – "fastened", "position", and "securely"
2012	Elbaz – U.S. Publication No. 2004/0259423
2013	Deng – U.S. Patent No. 6,829,672

LIST OF EXHIBITS

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<i>In re Bigio</i> , 381 F.3d 1320 (Fed. Cir. 2004)	

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