

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEALS BOARD

BROSE NORTH AMERICA, INC.
and
BROSE FAHRZEUGTEILE GMBH & CO. KG, HALLSTADT,
Petitioners

v.

UUSI, LLC
Patent Owner

Case No. IPR2014-00417
Patent No. 7,579,802

REPLY DECLARATION OF DR. C. ARTHUR MACCARLEY
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 7,579,802

TABLE OF CONTENTS

	<u>Page</u>
I. CONSTRUCTION OF CLAIM 1	10
A. Limitation 1(a) Does <u>Not</u> Require a Current Value (Magnitude) Sensor; <u>Instead</u> , the Limitation is Sufficiently Broad to Include Other Types of Sensors, Including Speed Sensors, Including a Speed Sensor in the Form of a Motor Current Commutation Pulse Sensor	10
B. The “De-Activate” Limitation of Claim 1	40
II. CONSTRUCTION OF CLAIM 7	41
A. Limitation 7(a) Does <u>Not</u> Require a Separate, Discrete Physical Sensor (Such as a Hall Effect Sensor or Other Encoder); <u>Instead</u> , the Limitation is Sufficiently Broad to Include Other Types of Sensors From Which Motor Speed of Movement Can Be Determined, Including, For Example, a Motor Current Commutation Pulse Sensor.	41
B. Neither the Preamble of Claim 7, Nor Limitation (a) (the Sensor Limitation) of Claim 7, Requires that Detection Based on the Obstacle Detect Threshold be Performed Along the <u>Entire</u> Path of Travel of the Window.	58
C. The “signal...for stopping the motor” Limitation of Claim 7	71
III. CONSTRUCTION OF CLAIM 14	72
A. Limitations (c) and (c)(i)-(iv) of Claim 14 of the ’802 Patent Are <u>Not</u> Written in “Means-Plus-Function” Form.....	72
B. The “Deactivating the Motor” Limitation of Claim 14.....	91
I. UNPATENTABILITY OF INDEPENDENT CLAIM 1	92
A. Claim 1 Would Have Been Obvious Over Itoh (Ground 1) Under Either Party’s Proposed Construction	92

B.	Claim 1 is Anticipated by Itoh, Subject to the “Deactivating” Issue, Which UUSI Does Not Address (Ground 2)	95
C.	Claim 1 Would Have Been Obvious Over Itoh in View of Kinzl (Ground 5)	98
II.	UNPATENTABILITY OF DEPENDENT CLAIM 6	100
A.	Claim 6 Would Have Been Obvious Over Itoh (Ground 1)	100
B.	Claim 6 would have been obvious over Itoh in view of Kinzl (Ground 5)	128
III.	UNPATENTABILITY OF INDEPENDENT CLAIM 7 AND ITS DEPENDENT CLAIMS 8–9	129
A.	Claims 7–9 Would Have Been Obvious over Itoh (Ground 1).....	130
B.	Claims 7–9 Are Anticipated by Itoh Subject to the “Deactivating” Issue, Which UUSI Does Not Address (Ground 2)	145
C.	Claims 7 and 9 Are Anticipated by Kinzl (Ground 3)	148
D.	Claims 7 and 9 would have been obvious over Kinzl (Ground 4)....	154
E.	Claims 7-9 Would Have Been Obvious Over Itoh in View of Kinzl (Ground 5)	159
F.	Claims 7-9 Would Have Been Obvious Over Itoh in View of Zuckerman (Ground 6).....	165
G.	Claims 7-9 Would Have Been Obvious Over Itoh in View of Kinzl and Zuckerman (Ground 7)	169
I.	UNPATENTABILITY OF INDEPENDENT CLAIM 14	173
A.	Claim 14 Would Have Been Obvious Over Itoh (Ground 1)	173
B.	Claim 14 is Anticipated by Itoh, Subject to the “De-activating” Issue, Which UUSI Does Not Address (Ground 2)	176
C.	Claim 14 is Anticipated by Kinzl (Ground 3).....	179

D.	Claim 14 Would Have Been Obvious Over Kinzl (Ground 4).....	182
E.	Claim 14 Would Have Been Obvious Over Itoh in View of Kinzl (Ground 5)	184
F.	Claim 14 Would Have Been Obvious Over Itoh in View of Zuckerman (Ground 6).....	189
G.	Claim 14 Would Have Been Obvious Over Itoh in View of Kinzl and Zuckerman (Ground 7).....	193
II.	MOTIVATION AND ABILITY TO COMBINE.....	199
A.	Combination of Itoh and Kinzl.....	199
B.	Combinations of (i) Itoh and Zuckerman, and (ii) Itoh, Kinzl, and Zuckerman	208
III.	ENABLEMENT	213
A.	Itoh Enables Claims 1, 6–9, and 14 of the '802 Patent, Either Alone or in Combination with Kinzl and/or Zuckerman	213
B.	Kinzl Enables Claims 7, 9, and 14 of the '802 Patent	218
IV.	SECONDARY CONSIDERATIONS OF NON-OBVIOUSNESS	221

I, C. Arthur MacCarley, do hereby declare as follows:

INTRODUCTION

1. In my prior declaration, dated February 6, 2014, I set forth my analyses and opinions that claims 1, 6-9, and 14 (“the Challenged Claims”) of the ’802 patent are anticipated and would have been obvious to a person having ordinary skill in the art at the time of the alleged invention.

2. Since that declaration, the Board has instituted an IPR trial, and UUSI has submitted its Preliminary Response and Response. This declaration responds to issues raised by the Board and UUSI in the year since my prior declaration.

3. In preparing this Declaration, I have reviewed the materials identified and listed in my February 6, 2014 declarations, as well as the materials discussed herein and/or listed in Appendix A to this declaration.

4. In forming the opinions expressed in this Declaration, I relied upon my education and experience in the relevant field of the art, and have considered the viewpoint of a person having ordinary skill in the relevant art, as of April 22, 1992. My opinions are based upon readings of the ’802 patent, the prior art, matters referenced in this declaration, my knowledge of the state of the art, and my expertise in the field.

COMPENSATION AND QUALIFICATIONS

5. My compensation and qualifications are set forth in my earlier declaration, dated February 6, 2014.

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