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Applicant:	Kolcraft Enterprises, Inc.	Artsana USA, Inc.
Case No.:	IPR2014-01053	v.
Filing Date:	3/5/2013	Kolcraft Enterprises, Inc.
Patent No.:	8,388,501	Trial Paralegal: Amy Kattula
Title:	Play Gyms and Methods of Operating the Same	Attorney Doc.: KOL501IPR

**PRELIMINARY RESPONSE OF PATENT OWNER  
PURSUANT TO 37 C.F.R. § 42.107**

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**TABLE OF CONTENTS**

I. INTRODUCTION .....1

II. CLAIM CONSTRUCTION .....3

    A.    BROADEST REASONABLE INTERPRETATION OF "COUPLE", "COUPLED"  
          AND "COUPLABLE" .....5

    B.    BROADEST REASONABLE INTERPRETATION OF "PLAY GYM" .....9

    C.    BROADEST REASONABLE INTERPRETATION OF "CONNECTOR OF THE  
          FLOOR MAT IS POSITIONED ON AN UNDERSIDE OF THE FLOOR MAT",  
          "SECOND PLURALITY OF CONNECTORS PROVIDED ON THE SECOND  
          SURFACE OF THE FLOOR MAT" AND "FLOOR MAT DEFINING ... A  
          BOTTOM SURFACE ... HAVING A FIRST CONNECTOR THAT INCLUDES  
          AN OPENING" .....15

    D.    BROADEST REASONABLE  
          INTERPRETATION OF "PIVOTALLY COUPLED" .....19

III. PATENT OWNER'S RESPONSE TO PETITIONER'S INVALIDITY  
      ARGUMENTS .....24

    A.    GROUND 1 – DOLE DOES NOT ANTICIPATE CLAIMS 14, 19 AND 20.....24

        1.    Dole Was Previously Considered By The USPTO.....24

        2.    Dole Fails To Disclose All Limitations Of Claims 14, 19 Or 20  
              Of The '501 Patent .....25

    B.    GROUND 2 - RUPERT DOES NOT ANTICIPATE CLAIMS 14 AND 19 .....31

        1.    Rupert Was Previously Considered By The USPTO .....31

        2.    Rupert Fails To Disclose All Limitations Of Claims 14 Or 19  
              Of The '501 Patent .....31

    C.    GROUND 3 – THE COMBINATION OF DOLE IN VIEW OF GRACO DOES  
          NOT RENDER CLAIMS 1-13, 15, 16 AND 18 OBVIOUS .....35

        1.    Dole And Graco Were Both Previously Considered By The  
              USPTO .....35

2.	Dole Is Non-Analogous Art.....	36
3.	The Combination Of Dole In View Of Graco Fails To Teach Or Suggest All Limitations Of Claims 1-13, 15, 16 And 18 .....	40
D.	GROUND 4 – THE COMBINATION OF TYCO IN VIEW OF GRACO DOES NOT RENDER CLAIMS 1, 6, 7, 9, 12 AND 13 OBVIOUS .....	43
1.	Tyco Is Not Prior Art .....	43
E.	GROUND 5 – THE COMBINATION OF TYCO IN VIEW OF GRACO AND IN FURTHER VIEW OF DOLE DOES NOT RENDER CLAIMS 2-5, 8 AND 11 OBVIOUS .....	51
1.	Tyco Is Not Prior Art .....	51
2.	Dole Is Non-Analogous Art.....	51
F.	GROUND 6 – THE COMBINATION OF TYCO IN VIEW OF RUPERT DOES NOT RENDER CLAIMS 14, 19 AND 20 OBVIOUS.....	52
1.	Tyco Is Not Prior Art .....	52
2.	Rupert Is Non-Analogous Art.....	52
G.	GROUND 7 – THE COMBINATION OF TYCO IN VIEW OF RUPERT AND IN FURTHER VIEW OF CENTURY DOES NOT RENDER CLAIMS 15-18 OBVIOUS .....	56
1.	Tyco Is Not Prior Art .....	56
2.	Rupert Is Non-Analogous Art.....	56
IV.	CONCLUSION.....	57

## EXHIBIT TABLE

Exhibit	Description
2002	Feb. 12, 2010 Office Action in Reexamination Control No. 95/000,514
2003	US 6,109,280 to Custer
2004	Dec. 9, 2013 Board Decision in Reexamination Control No. 95/000,514
2005	<i>Zetec, Inc. v. Westinghouse Elec. Co.</i> , IPR2014-00384, 2014 WL 3704254 (P.T.A.B. July 23, 2014)
2006	<i>Schott Gemtron Corp. v. SSW Holding Co.</i> , 2013 WL 8595307 (P.T.A.B. Nov. 4, 2013)
2007	<i>Schott Gemtron Corp. v. SSW Holding Co.</i> , 2014 WL 4181969 (P.T.A.B. Aug. 20, 2014)
2008	<i>Silver Peak Sys., Inc. v. Riverbed Tech., Inc.</i> , IPR-2014-00149, 2014 WL 1784058 (P.T.A.B. May 2, 2014)
2009	<i>EMC Corp. v. PersonalWeb Technologies, LLC</i> , IPR-2013-00087, 2013 WL 8595566 (P.T.A.B. May 17, 2013)
2010	<i>Elec. Frontier Foundation v. Personal Audio, LLC</i> , IPR2014-00070, 2014 WL 1604334 (P.T.A.B. Apr. 18, 2014)

In accordance with 35 U.S.C. § 313 and 37 C.F.R. § 42.107, Kolcraft Enterprises, Inc. ("Kolcraft" or "Patent Owner") respectfully submits this Preliminary Response to the Petition for *Inter Partes* Review of claims 1-20 of U.S. Patent No. 8,388,501 (the "'501 patent") filed by Artsana USA, Inc. ("Artsana" or "Petitioner"). This Preliminary Response is timely under 37 C.F.R. § 42.107(b) because it is being filed within three months of the mailing date of the Notice of Filing Date Accorded to Petition and Time for Filing Patent Owner Preliminary Response (Paper 3), which was mailed on July 8, 2014.

## **I. INTRODUCTION**

In its Corrected Petition for *Inter Partes* Review of U.S. Patent No. 8,388,501 (Paper 5, hereinafter "Petition"), Petitioner alleges that various claims of the '501 patent are anticipated by U.S. Patent No. 3,223,098 to Dole ("Dole") (Ground 1 of the Petition) and U.S. Patent No. 2,948,287 to Rupert ("Rupert") (Ground 2 of the Petition). Petitioner further alleges that various claims of the '501 patent are rendered obvious by five different combinations of prior art: (1) Dole in view of the Graco Pack 'N Play Model No. 386-11-01 Owner's Manual (©2001) ("Graco") (Ground 3 of the Petition); (2) the alleged publication of Tyco's Sesame Street Cozy Quilt Gym ("Tyco") in view of Graco (Ground 4 of the Petition); (3) Tyco in view of Graco and in further view of Dole (Ground 5 of the Petition); (4) Tyco in view of Rupert (Ground 6 of the Petition); and (5) Tyco in view of Rupert

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