Applicant:	Darbee	Universal Remote Control, Inc.
Case No.:	IPR2014-01104	V.
Filing Date:	October 8, 1993	Universal Electronics, Inc.
Patent No.:	5,414,761	Trial Paralegal: Cathy Underwood
Title:	REMOTE CONTROL SYSTEM	Attorney Doc.: 059489.144300

Patent Trial and Appeal Board United States Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

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I.	INTRODUCTION		
II.	CLA	AIM CONSTRUCTION	
	A.	"input means for inputting commands into [the/said] remote control" (Claims 1, 14, 15, 16, and 17)5	
	B.	"infrared signal output means [] for supplying an infrared signal to a controlled device" (Claims 1, 14, 15, 16, and 17)7	
	C.	"data coupling means including receiving means coupled to the CPU for enabling at least one of (a) instruction codes or (b) code data for creating appropriate IR lamp driver instructions to be supplied from outside the remote control through the receiving means directly to the CPU for direct entry to the memory" (Claim 1)	
	D.	"data coupling means for periodically coupling said computer to said remote control for receiving from said computer memory and inputting into said memory means of said remote control at least one of (a) said instruction codes or (b) said code data for ceating appropriate IR lamp driver instructions" (Claims 14 and 15), and "data coupling means for periodically coupling said computer to said remote control for receiving from said computer memory and inputting into said memory means of said remote control said instruction codes" (Claims 16 and 17)	
	E.	"coupling means for coupling the receiving means to a computer, directly, through a telephone line, through a modem and a telephone line, or through decoding means and a television set" (Claim 1)16	
	F.	"a data transmission system including said data coupling means for coupling said remote control to said computer, directly, through a telephone line, through a modem and a telephone line, or through decoding means and a television set" (Claims 15 and 17)21	
	G.	"code data"	
III.		ENT OWNER'S RESPONSE TO PETITIONER'S REMAINING DUND FOR INVALIDITY	

A.	Neither Ciarcia Nor Hastreiter Meet the "code data for creating appropriate IR lamp driver instructions for causing said infrared signal output means to emit infrared signals" Limitation
B.	One Having Ordinary Skill in the Art Would Not Have Been Motivated to Combine Ciarcia and Hastreiter
C.	The Secondary Considerations of Non-Obviousness Overcome Any Finding that Claims 1, 9, 10, and 14-17 of the '761 Patent is Obvious 
D.	Petitioner Failed to Identify All Real Parties in Interest such that its Petition is Deficient
CON	ICLUSION

IV.

Cable Elec. Prods., Inc. v. Genmark, Inc., 770 F.2d 1015 (Fed. Cir. 1985)
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