UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VALEO NORTH AMERICA, INC., VALEO S.A., VALEO GMBH,
VALEO SCHALTER UND SENSOREN GMBH,
AND CONNAUGHT ELECTRONICS LTD.
Petitioners

v.

MAGNA ELECTRONICS, INC.
Patent Owner

Case IPR2015-00253 Patent 8,643,724

PATENT OWNER MAGNA ELECTRONICS, INC.'S PRELIMINARY RESPONSE TO PETITION PURSUANT TO 37 C.F.R. § 42.107

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TABLE OF CONTENTS

I.	The 1	Board should not institute <i>inter partes</i> review of the '724 patent1			
II.	Valeo's obviousness analysis is deficient because Valeo fails to resolve the level of ordinary skill in the art4				
	A.	The Petition does not resolve the level of ordinary skill in the art4			
	B.	Dr. Wolberg and Dr. Wilhelm confuse, rather than resolve, the level of ordinary skill in the art5			
III.	Valeo's obviousness analysis is deficient because Valeo fails to show that a POSA would have combined the references				
	A.	Dr. Wolberg's and Dr. Wilhelm's reliance on each other invalidates Valeo's assertion that a POSA would have been motivated to combine the references			
		1.	Dr. Wolberg merely assumes that a POSA would have combined Lemelson with Nissan, Hino, Wang, and Aishin10		
		2.	Dr. Wilhelm merely assumes that a POSA would have combined Nissan, Hino, Wang, and Aishin		
		3.	The declarants' piecemeal approach to the references, with differing definitions of a POSA, evidences that a POSA would not have combined the references		
	B.	Dr. Wolberg and Dr. Wilhelm fail to consider the claims as a whole.1			
	C.	Valeo fails to adequately show how a POSA would have combined Nissan and Hino.			
IV.	Valeo's obviousness analysis is deficient because the Petition fails to identify how the construed claim is unpatentable				
	A.	The I	Petition does not adequately discuss the asserted references22		
	B.	Valeo's reasons for combining the references are conclusory23			
	C.		o fails to adequately explain the significance of the evidence cited e claim charts23		



Case IPR2015-00253 of U.S. Patent No. 8,643,724

	1.	Claim 49	24			
	2.	Claims 54 and 69	25			
V.	Nissan and Hino are insufficient to disclose "wherein said synthesized image approximates a view as would be seen by a virtual camera at a single					
	location exterior of the equipped vehicle."27					
VI.	Conclusion	1	32			



TABLE OF AUTHORITIES

Cases

Beckman Instruments v. LKB Produkter AB, 892 F.2d 1547 (Fed. Cir. 1989)	27
Cisco Systems, Inc. v. C-Cation Technologies, LLC, IPR2014-00454, Paper 12 (P.T.A.B. Aug. 29, 2014)	20
Google Inc. v. Visual Real Estate, Inc., IPR2014-01338, Paper 3 (P.T.A.B. Sept. 2, 2014)	20
Graham v. John Deere Co., 383 U.S. 1 (1966)	4
In re Aslanian, 590 F.2d 911 (C.C.P.A. 1979)	27
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006)	15, 23
Int'l Business Machines Corp. v. Intellectual Ventures II LLC, IPR2014-00673, Paper 18 (P.T.A.B. Dec. 23, 2014)	20
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)	4, 15, 16, 23
Marvell Semiconductor, Inc. v. Intellectual Ventures I LLC, IPR2014-00547, Paper 3 (P.T.A.B. April 10, 2014)	20
Ryko Mfg. Co. v. Nu-Star, Inc., 950 F.2d 714 (Fed. Cir. 1991)	5
Symbol Techs. Inc. v. Opticon Inc., 935 F.2d 1569 (Fed. Cir. 1991)	
ZTE Corp. v. ContentGuard Holdings, Inc., IPR2013-00136, Paper 31 (P.T.A.B. Nov. 5, 2013)	20, 23
<u>Statutes</u>	
35 U.S.C. § 103	4



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35 U.S.C. § 103(a)	4, 15
35 U.S.C. § 314(a)	1, 4
Rules	
37 C.F.R. § 42.104(b)(4)	5, 19
37 C.F.R. § 42.104(b)(5)	19, 24
37 C.F.R. § 42.107(b)	1
37 C.F.R. § 42.22(a)(2)	19
37 C.F.R. § 42.24(a)(1)(i)	19
37 C.F.R. § 42.6(a)(3)	20
Other Authorities	
M.P.E.P. § 2121.01	27
M.P.E.P. § 2125	27

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