UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TRW AUTOMOTIVE U.S. LLC

Petitioner

v.

MAGNA ELECTRONICS, INC.

Patent Owner

Cases IPR2015-00436, IPR2015-00437, IPR2015-00438, IPR2015-00439

Patent 8,599,001 B2

PETITIONER'S REPLY TO PATENT OWNER RESPONSE

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I.	Intro	duction1			
II.	It was obvious to combine Vellacott with Kenue to provide a forward facing camera.				
	A.	Collateral estoppel does not preclude TRW from combining Vellacott and Kenue			
	B.	Only an automaton with no common sense could find that Vellacott and Kenue are not combinable			
		1. Reversing Vellacott's camera to face forward would not have rendered the system unsuited for its intended purpose			
		2. There was reasonable expectation of success in combining Vellacott with Kenue			
		3. Only an automaton would not be enabled to make the invention of the '001 Patent based upon Vellacott and Kenue			
III.	The relevant references disclose all aspects of the claimed invention15				
	A.	Both Vellacott and Kenue disclose a module attached to a windshield			
	B.	Vellacott combined with Kenue discloses an array with more columns than rows			
	C.	The combination of Vellacott and Kenue teaches pattern recognition.			
	D.	Vellacott and Kenue teach a control that determines a peak light level in at least one subarray			
	E.	Vellacott and Kenue teach an electrical connector to a power source of the vehicle			



	F.	co	ellacott and Kenue teach the use of an image processor that mpares captured image data with stored image data and tputs a vehicle control signal based on the comparison	21
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V.	Conc	lusi	on	37



Exhibit List

Ex. No.	Description
Ex. List	Exhibit List
(Ex. 1001)	
'001 Patent	U.S. Patent No. 8,599,001 for Vehicular Vision System, issued to
(Ex. 1002)	Schofield et al. on December 3, 2013.
'001 FH	Prosecution History File Wrapper of U.S. Patent No. 8.599,001
(Ex. 1003)	
Vellacott	Vellacott, Oliver, "CMOS in Camera," IEE Review, pp. 111-114
(Ex. 1004)	(May 1994)
Kenue	U.S. Pat. No. 4,970,653 issued to Kenue on Nov. 13, 1990
(Ex. 1005)	
Yanagawa	Japanese Kokai Application for Travelling Vehicle Recognition
(Ex. 1006)	Device, by Yanagawa et al., No. S62-131837, published June 15,
	1987, together with certified translation.
Venturello	European Pat. Appl. No. 0 353 200 published Jan. 31, 1990 to
(Ex. 1107)	Venturello
Schofield	U.S. Pat. No. 4,930,742 issued to Schofield on June 5, 1990
(Ex. 1108)	
Denyer	PCT Pub. No. WO 93/11631, published June 10, 1993
(Ex. 1009)	
Bottesch	U.S. Pat. No. 5,166,681 issued to Bottesch on Nov. 24, 1992
(Ex. 1010)	
Miller Dec.	Expert Declaration of Jeffrey A. Miller
(Ex. 1011)	
(Ex 1012)	Original Transcript of Board Telephone Conference Hearing
(7, 1010)	(January 12, 2016)
(Ex 1013)	G. Moore, "Cramming more components onto integrated circuits,"
(T. 1014)	Electronics, Vol. 38, No. 8, April 19, 1965
(Ex 1014)	Curriculum Vitae of Lester J. Kozlowski
(Ex 1015)	L. Kozlowski et al., "2.5µm PACE-I HgCdTe 1024x1024 FPA,"
(T. 1016)	Proc. IRIS Detector Specialty, August 1994
(Ex 1016)	Business Wire, "Rockwell Scientific and UMC Develop Ultra Large
	Readout IC for Infrared Astronomy," Aug. 22, 2002



(Ex 1017)	J. Beletic, "Exotic Imaging: IR focal plane arrays enable imaging
	that is out of this world," Laser Focus World, October 2007
(Ex 1018)	P. Noble, "Self-Scanned Silicon Image Detector Arrays," IEEE
	Trans. ED, Vol. ED-15, No. 4, April 1968
(Ex 1019)	P. Fry and P. Noble, "Fixed Pattern Noise in Photomatrices," IEEE
	JSSC, Vol. SC-5, No.5, Oct. 1970
(Ex 1020)	V. Graefe, "Vision for Intelligence Road Vehicles"
(Ex 1021)	J.D. Plummer and J.D. Meindl, "A Low Light Level Self-Scanned
	MOS Image Sensor," ISSCC72, Feb. 1972
(Ex 1022)	G.J. Michon and H.K. Burke, "Charge Injection Imaging," ISSCC
	73, Feb. 15, 1973
(Ex 1023)	G.J. Michon and H.K. Burke, "Operational Characteristics of CID
	Imager," ISSCC 74, Feb. 13, 1974
(Ex 1024)	C. Anagnostopoulos, "Signal Readout in CID Image Sensors," IEEE
	JSSC, Vol. SC-13, No. 1, Feb. 1978
(Ex 1025)	R. Ballingall et al., "Two-Dimensional Random Access Infrared
	Arrays," IEE Advanced Infrared Detectors and Systems, No. 228,
	London, 1983
(Ex 1026)	I. M. Baker et al., "Photovoltaic CdHgTe – silicon hybrid focal
	plane," Infrared Technology X, Proceedings of SPIE v. 510, 1984
(Ex 1027)	Renshaw et al., "ASIC Image Sensors," IEEE International
	Symposium on Circuits and Systems, 1-3 May 1990, pp. 3038-3041
	Vol. 4 (1990)
(Ex 1028)	K. Chen, M. Afghani, P.E. Danielson, and C. Svensson, "PASIC: A
	processor-A/D converter-sensor integrated circuit," ISCAS90, pp.
	1705-1708, 1-3 May 1990
(Ex 1029)	T. Ozaki, et al., "A Low-Noise Line-Amplified MOS Imaging
	Devices", IEEE Transactions on Electron Devices, Vol. 38, No. 5
	(May 1991)
(Ex 1030)	U.S. Patent No. 3,949,162 issued to Malueg on April 6, 1976
(Ex 1031)	U.S. Patent No. 4,000,418, issued to Waldron on Dec. 28, 1976
(Ex 1032)	U.S. Patent No. 4,011,442 issued to Engeler on March 8, 1977
(Ex 1033)	U.S. Patent No. 4,079,422, issued to Anagnostopoulos on March 14,
	1978
(Ex 1034)	U.S. Pat. No. 4,434,441, issued to Ishizaki on Feb. 28, 1984
(Ex 1035)	U.S. Patent No 8,637,801 issued to Schofield et al. on January 28,
	2014



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