

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,

Petitioner,

v.

SIGNAL IP, INC.,

Patent Owner.

Case IPR2015-00968

Patent 5,714,927 B1

PATENT OWNER'S PRELIMINARY RESPONSE

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1. Introduction.

Petitioner challenges the patentability of claims 1, 2, and 6 of U.S. Patent 5,714,927 (the “’927 Patent”). The Patent Trial and Appeal Board (“Board”) should not institute *inter partes* review of the ‘927 Patent because Petitioner has not met its burden to show a reasonable likelihood that any challenged claim of the ‘927 Patent is unpatentable.

2. Overview of the ‘927 Patent.

The ‘927 Patent discloses an improved method for using side detection radar to warn a driver about objects in the blind spot of a vehicle.¹ Generally, vehicles that use radar detection systems do so to identify nearby obstacles, or “targets.”² Such systems analyze the relative speeds of the host and target and decide whether to “report” a target.³ Figure 1 of the ‘927 Patent, an annotated version of which is reproduced below, shows a vehicle with side detection radar antennae behind the side view mirror. The antennae are part of a side detection system,⁴ which also includes a signal processor, a

¹ *Ex. 1001* at Abstract.

² *Id.* at 1:13-4.

³ *Id.* at 1:35-39.

⁴ *Id.* at 2:66-3:2.

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