UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD
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AMERICAN HONDA MOTOR CO., INC.,
HONDA OF AMERICA MFG., INC.,
HONDA PATENTS & TECHNOLOGIES NORTH AMERICA, LLC,
and HONDA MOTOR CO., LTD.,

Petitioner,

v.

SIGNAL IP, INC.,

Patent Owner.

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Case IPR2015-01004

Patent 6,012,007

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PATENT OWNER'S RESPONSE

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TABLE OF AUTHORITIES

CASES

STATUTES

EXHIBIT LIST

Exhibit No.	Description
2001	Transcript of deposition of Dr. Carr.

1. Introduction.

Petitioner's challenge to the patentability of claims 1-3, 5, 9, and 17-21 of U.S. Patent 6,012,007 (the "'007 Patent") should be denied and the Patent Trial and Appeal Board ("PTAB" or "Board") should confirm the patentability of these claims because *Schousek* fails to teach or suggest allowing deployment of air bags when a relative weight parameter used by a vehicle restraint system is above a first threshold, establishing a lock threshold above the first threshold, and setting a lock flag when the relative weight parameter is above the lock threshold and deployment has been allowed for a given time. As explained below, and contrary to Petitioner's contentions, the minimum weight of an occupied infant seat as used by *Schousek* is not equivalent to the first threshold of the relative weight parameter recited in the challenged claims. This is because in *Schousek,* air bag deployment is not *allowed* when seat sensors detect a weight above that minimum weight of an occupied infant seat. Instead, air bag deployment is inhibited in such circumstances unless the seat sensors also detect a forward-facing infant seat.

Further, even if one were to equate the minimum weight of an occupied infant seat as used by *Schousek* with the first threshold of the relative weight parameter recited in the challenged claims, it would still be

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