

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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.

Case IPR2015-01004

Patent 6,012,007

PATENT OWNER'S PRELIMINARY RESPONSE

TABLE OF CONTENTS

1. Introduction.....	1
2. Overview of the ‘007 Patent.....	1
3. Argument.....	9
A. Petitioner Has Failed to Demonstrate that Any of the Challenged Claims Are Anticipated by Schousek.....	9
B. Petitioner Has Failed to Demonstrate that Either of Claims 18 and 19 are Obvious in View of Schousek and Blackburn.....	17
C. Petitioner Has Failed to Demonstrate that Any of Claims 1-3, 5, and 17-21 are Obvious in View of Blackburn.....	19
D. Petitioner Has Failed to Demonstrate that Any of Claims 1-3, 5, and 17-21 are Obvious in View of the Combined teachings of Blackburn and Schousek.....	21
E. Petitioner Has Failed to Demonstrate Why Redundant Grounds of Institution Are Appropriate.....	22
4. Conclusion.....	23

TABLE OF AUTHORITIES

CASES

<i>CFMT, Inc. v. Yieldup Int'l. Corp.</i> , 349 F.3d 1333 (Fed. Cir. 2003)	18, 20
<i>Hartness Int'l, Inc. v. Simplimatic Eng'g Co.</i> , 819 F.2d 1100 (Fed. Cir. 1987)	21
<i>Illumina, Inc. v. Trustees of Columbia Univ.</i> , IPR2012-00006 (P.T.A.B. May 10, 2013).	22, 23
<i>Lindemann Maschinenfabrik GMBH v. Am. Hoist & Derrick Co.</i> , 730 F.2d 1452 (Fed. Cir. 1984)	15
<i>Net MoneyIN, Inc. v. VeriSign, Inc.</i> , 545 F.3d 1359 (Fed. Cir. 2008)	16
<i>Richardson v. Suzuki Motor Co.</i> , 868 F.2d 1226 (Fed. Cir. 1989)	12
<i>Schering Corp. v. Geneva Pharm.</i> , 339 F.3d 1373 (Fed. Cir. 2003)	12, 16

STATUTES

35 U.S.C. § 112(d)	16, 18
35 U.S.C. § 314(a)	9

REGULATIONS

37 C.F.R. § 42.108(c).....	9, 17, 21
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1. Introduction.

Petitioner challenges the patentability of claims 1-3, 5, 9, and 17-21 of U.S. Patent 6,012,007 (the “’007 Patent”). For at least the reasons explained below, the Patent Trial and Appeal Board (“PTAB” or “Board”) should not institute *inter partes* review of the ‘007 Patent because Petitioner has not met its burden to show a reasonable likelihood that the challenged claims of the ‘007 Patent are unpatentable.

2. Overview of the ‘007 Patent.

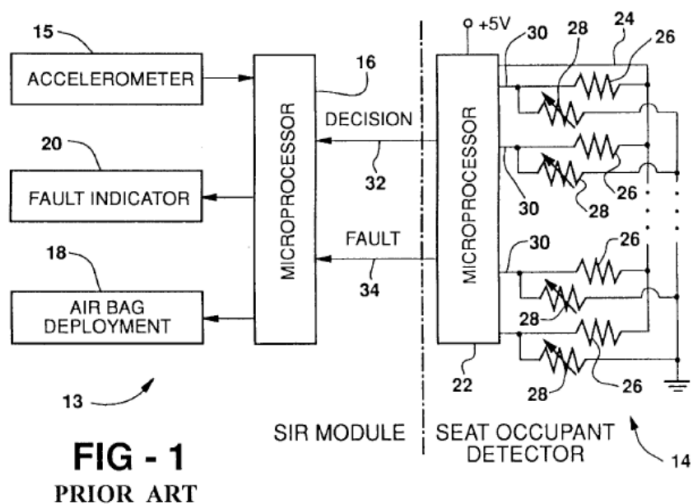
The ‘007 Patent discloses a method of controlling airbag deployment using pressure sensors to allow or inhibit airbag deployment based on passenger weight.¹ According to the specification, air bag deployment is inhibited when a seat is empty or occupied by a small child. Deployment is allowed when the seat is occupied by a larger passenger.²

Figure 1 of the ‘007 patent (below) shows a typical airbag (or supplemental inflatable restraint -- “SIR”) system:³

¹ *Ex. 1001* at Abstract.

² *Id.* at 2:55-58.

³ *Id.* at 1:15-16, 2:18-19.



An accelerometer (15) senses an impending crash and a microprocessor (16) receives signals from the accelerometer and determines whether to deploy an air bag.⁴ On the other side of the figure, seat occupant sensors (26, 28) communicate with a separate microprocessor (22), which determines whether airbag deployment should be inhibited.⁵ The occupant sensors are a series of voltage dividers made of resistors (26) in series with a pressure sensor or variable resistor(28).⁶ The seat occupant detector microprocessor (22) analyzes seat occupant sensor voltage in order to derive passenger weight information.⁷

⁴ *Id.* at 2:46-49.

⁵ *Id.* at 3:4-7.

⁶ *Id.* at 2:64-3:2.

⁷ *Id.* at 2:61-3:7.

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