Filed on behalf of
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LINDSAY CORPORATION
Petitioner

v.

VALMONT INDUSTRIES, INC.
Patent Owner

Case No. IPR2015-01039
U.S. Patent No. 7,003,357

PETITIONER'S REPLY

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TABLE OF AUTHORITIES

Cases

This review presents an inordinately simple case of obviousness.

Valmont's independent claims recite a remote user interface having software on a processor that uses wireless communications to communicate with irrigation equipment. A display shows the status of the irrigation equipment with GUI elements and a user can control the irrigation equipment by interacting with GUI elements on the display. Valmont responds that its non-obvious advancement is providing the claimed structure and functionality in a *hand-held* unit. But it relies on the discredited and irrelevant argument that one could not bodily incorporate the structure of one reference into another, ignoring black letter law criticizing arguments based on the inability to bodily combine prior art references.

The evidence in this matter makes clear that Valmont's claimed invention is obvious because it claims well-known concepts combined in a desired manner to provide portability to achieve routine, expected results. Indeed, Valmont did not invent computer hardware or displays like those found in PDAs, cell phones, laptops, or hand held computers. Valmont did not invent computer processors, wireless communications hardware, or wireless communications protocols. Nor did Valmont invent the software required to operate GUIs on remote controls or the concept of using a computer with a graphical user interface ("GUI") to remotely control irrigation equipment. Indeed, as admitted by Valmont's expert, the

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