

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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NISSAN NORTH AMERICA, INC.

Petitioner,

v.

JOAO CONTROL & MONITORING SYSTEMS, LLC

Patent Owner

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Case IPR2015-01509

Patent 6,549,130

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**PATENT OWNER'S RESPONSE TO PETITION**  
**FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.107**

**TABLE OF CONTENTS**

	<u>Page</u>
I. INTRODUCTION .....	1
II. BACKGROUND.....	3
A. Overview of the ‘130 Patent .....	3
B. Prosecution History of the ‘130 Patent .....	4
C. Representative Claims.....	4
III. CLAIM CONSTRUCTION.....	10
A. Legal Standards.....	10
B. “interface device” .....	12
C. “control device” .....	14
D. “first signal,” “second signal” and “third signal” .....	15
IV. DR. DAVID McNAMARA’S DECLARATION IS FUDAMENTALLY FLAWED .....	16
A. Dr. McNamara did not Review the Materials Required to Properly Reach his Conclusions and Opinions.....	16
B. Dr. McNamara has an Erroneous Understanding of the Standards to Use in Construing Patent Claims .....	17

C. Dr. McNamara’s Testimony Should be Given Little or No Weight ..... 19

V. RESPONSE TO PROPOSED GROUNDS OF INVALIDITY ..... 19

    A. Nomenclature Used..... 19

    B. Ground 1 is Deficient ..... 20

        1. Frossard fails to disclose the “A to B to C” system/method of claims 26, 42 and 48..... 21

        2. Claims 29, 33, and 68 are likewise not anticipated by Frossard..... 24

    C. Ground 2 is Deficient ..... 24

    D. Ground 3 is Deficient..... 25

    E. Ground 4 is Deficient ..... 26

        1. Pagliaroli fails to teach the “A to B to C” system/method of claims 26, 42 and 48..... 26

        2. Claims 29, 30, and 48 are likewise not anticipated by Pagliaroli ..... 30

    F. Ground 5 is Deficient..... 31

    F. Ground 6 is Deficient..... 31

VI. CONCLUSION..... 31

**LIST OF EXHIBITS**

Exhibit	Description
EX2001	"Preliminary Remarks" filed by Applicant on November 26, 2006 during prosecution of the patent application that issued as related U.S. Patent No. 7,277,010
EX2002	"Supplement to the Remarks for the Amendment filed on October 24, 2007" filed on November 23, 2007 during prosecution of the patent application that issued as related U.S. Patent No. 7,397,363
EX2003	Transcript of March 15, 2006 Deposition of Dr. David McNamara
EX2004	Transcript of March 16, 2006 Deposition of Dr. David McNamara

**I. INTRODUCTION**

In response to the Petition for *Inter Partes* Review (“Petition”) filed by Petitioner, the Board has instituted *inter partes* review (Paper 10, the “Decision”) of claims 26, 29, 30, 33, 42, 43, 48, 60 and 68 (“Challenged Claims”) of U.S. Patent No. 6,549,130 (“the ‘130 Patent”) based on the following grounds:

Ground	Claims	Proposed Rejections
1	26, 29, 33, 42, 48 and 68	anticipated by Frossard
2	30 and 43	obvious in view of Frossard and Pagliaroli
3	60	obvious in view of Frossard and Simms
4	26, 29, 30, 42, 43 and 48	anticipated by Pagliaroli
5	33 and 68	obvious in view of Pagliaroli and Frossard
6	60	obvious in view of Pagliaroli and Simms

Petitioner's assertion in Ground 1 that claims 26, 29, 33, 42, 48 and 68 are anticipated by Frossard is deficient. Frossard fails to disclose an “A to B to C” system as required by claims 26, 29, 33, 42, 48 and 68.

Petitioner's assertion in Ground 2 that claims 30 and 43 are obvious over Frossard in view of Pagliaroli is likewise deficient. Pagliaroli fails to remedy the fact that Frossard fails to disclose, teach or suggest an “A to B to C” system.

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