

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.

Petitioner,

v.

JOAO CONTROL & MONITORING SYSTEMS, LLC

Patent Owner

Case IPR2015-01611

Patent 6,549,130

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

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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	Declaration of Steven W. Ritcheson
EX2004	Transcript of April 21, 2016 Deposition of Scott Andrews
EX2005	"The Internet Report," Morgan Stanley Global Technology Group, February 1996.

I. INTRODUCTION

In response to the Petition for *Inter Partes* Review (“Petition”) filed by Petitioner, the Board has instituted *inter partes* review (Paper 7, the “Decision”) of claims 26, 31, 38, 42, 43, 48, 60, 63, 64, 73, 74, 85, 91, 92, 138, 139 and 143 (“Challenged Claims”) of U.S. Patent No. 6,549,130 (“the ‘130 Patent”) based on the following grounds:

Ground	claims	Proposed Rejections
1	26, 38, 42, 43, 48, 63, 73, 74, 91 and 138	anticipated by Kniffin
2	64, 85 and 92	obvious in view of Kniffin
3	31	obvious in view of Kniffin and Ryoichi
4	60 and 139	obvious in view of Kniffin and Drori
5	143	obvious in view of Kniffin and Neely

The five proposed grounds of rejection are substantively flawed, in that none of the cited references teach important properly construed claim limitations. Accordingly, Joao Control & Monitoring Systems, LLC (“JCMS” or “Patent Owner”) submits this Response to Petitioner’s Petition and the Board’s Decision.

II. BACKGROUND**A. Overview of the ‘130 Patent**

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