

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

Patent No. 6,549,130

Issue Date: April 15, 2003

Title: CONTROL APPARATUS AND METHOD FOR
VEHICLES AND/OR FOR PREMISES

PETITIONER'S REPLY

Case No. IPR2015-01611

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LISTING OF EXHIBITS

Exhibit 1001	U.S. Patent No. 6,549,130 to Joao
Exhibit 1002	Declaration of Scott Andrews
Exhibit 1003	U.S. Patent No. 6,028,537 to Suman
Exhibit 1004	June 4, 2001 Notice of Allowability for U.S. Patent App. Ser. No. 09/277,935
Exhibit 1005	October 29, 1998 Notice of Allowability for U.S. Patent App. Ser. No. 08/683,828
Exhibit 1006	U.S. Patent No. 6,072,402 to Kniffin
Exhibit 1007	U.S. Patent No. 5,113,427 to Ryoichi
Exhibit 1008	U.S. Patent No. 5,081,667 to Drori
Exhibit 1009	September 17, 2014 Order Granting <i>Ex Parte</i> Reexamination, Control No. 90/013,301
Exhibit 1010	January 20, 2015 Non-Final Office Action, Reexamination Control No. 90/013,301
Exhibit 1011	March 18, 2015 Response to Non-Final Office Action, Reexamination Control No. 90/013,301
Exhibit 1012	May 12, 2015 Supplemental Response to Non-Final Office Action, Reexamination Control No. 90/013,301
Exhibit 1013	May 22, 2015 Final Office Action, Reexamination Control No. 90/013,301
Exhibit 1014	May 22, 2015 Final Office Action, Reexamination Control No. 90/013,300

Exhibit 1015	U.S. Patent No. 4,602,127 to Neely
Exhibit 1016	U.S. Patent No. 5,732,074 to Spaur
Exhibit 1017	U.S. Patent No. 5,808,566 to Behr
Exhibit 1018	U.S. Patent No. 5,726,984 to Kubler
Exhibit 1019	July 29, 2015 Notice of Intent to Issue <i>Ex Parte</i> Reexamination Certificate, Reexamination Control No. 90/013,303
Exhibit 1020	June 1, 2015 Response to Office Action, Reexamination Control No. 90/013,303
Exhibit 1021	August 18, 2015 Memorandum Opinion and Order Regarding Claim Construction in <i>Joao Control & Monitoring Systems, LLC v. Protect America, Inc.</i> , Case No. 1:14-cv-134 (W.D. Tex.)
Exhibit 1022	March 23, 2016 Memorandum Opinion and Order in <i>Joao Control & Monitoring Systems, LLC v. Telular Corp.</i> , Case No. 1:14-cv-09852 (N.D. Ill.)
Exhibit 1023	June 10, 2016 Opinion and Order (1) Granting In Part and Denying In Part Defendant FCA US LLC'S Motion for Summary Judgment on Invalidity and Noninfringement (Dkt. 59) and (2) Denying as Moot Plaintiff Joao Control & Monitoring Systems, LLC'S Motion for Summary Judgment of Infringement of U.S. Patent No. 7,397,363 by UConnect Access (Dkt. 57) in <i>Joao Control & Monitoring Systems, LLC v. Chrysler Group LLC</i> , Case No. 4:13-cv-13957
Exhibit 1024	U.S. Patent No. 5,404,361 to Casorso
Exhibit 1025	U.S. Patent No. 5,875,486 to Toda

I. INTRODUCTION

This Petitioner's Reply is responsive to the Patent Owner's Response to Petition for *Inter Partes* Review Under 37 C.F.R. § 42.107 (the "Response").

As set forth in the Petition, the claims of U.S. Patent No. 6,549,130 (the "'130 patent") are invalid in view of the prior art cited therein, including U.S. Patent No. 6,072,402 (Exhibit 1006, "Kniffin"), U.S. Patent No. 5,113,427 (Exhibit 1007, "Ryoichi"), U.S. Patent No. 5,081,667 (Exhibit 1008, "Drori"), and U.S. Patent No. 4,602,127 (Exhibit 1015, "Neeley"). Despite the Patent Owner's ("Joao") assertions that the '130 patent describes a "novel and unconventional system," and claims a "specially assembled and programmed distributed control system for vehicles" (Response at 2), the '130 patent merely claims a conventional chain of three control devices, passing along signals to allow for remote operation of vehicle systems. As set forth in the Petition, the claimed systems and methods are disclosed by the cited prior art and were well known before the earliest effective filing date of the '130 patent, such that the challenged claims are invalid and should be canceled.

In its Response, Joao argues that Kniffin fails to describe a chain of three control devices for controlling a vehicle component, device, system, or subsystem, even though Kniffin describes communicating from a telephone and communications link, to a clearinghouse, to an in-vehicle control device for storing

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