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 IPR2015-01613

Patent 5,917,405

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	August 26, 2015 Opinion and Order Construing Disputed Claim Terms in the matter of *JCMS v. Chrysler Group LLC*, Case No. 13-cv-13957 (E.D. Mich.)
EX2005	Transcript of April 20, 2016 Deposition of Scott Andrews
EX2006	Transcript of April 21, 2016 Deposition of Scott Andrews
EX2007	"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 1, 2, 3, 7, 8, 11, 12, 14, 16, 17, 19 and 20 ("Challenged Claims") of U.S. Patent No. 5,917,405 ("the '405 Patent") based on the following grounds:

Ground	Claims	Proposed Rejections
1	1, 2, 7, 8, 11, 12, 14, 16, 17, 19 and 20	anticipated by Kniffen
2	3	obvious in view of Kniffen and DiLullo
3	1, 2, 7, 8, 11, 12, 14, 16, 17, 19 and 20	anticipated by Ryochi
4	3	obvious in view of Ryochi and Mansell

The four proposed grounds of rejection are substantively flawed, in that none of the cited references teach important properly construed claim limitations. For example, none of the cited references teach an "A to B to C" control system/method, as required by the challenged claims and as will be explained in more detail below.

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