

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HNI CORPORATION and ALLSTEEL INC.
Petitioners,

v.

DIRTT ENVIRONMENTAL SOLUTIONS LTD.
Patent Owner.

Case No. IPR2015-01690
Patent No. 8,024,901
Issue Date: September 27, 2011

Title: INTEGRATED RECONFIGURABLE WALL SYSTEM

**PATENT OWNER'S PRELIMINARY RESPONSE
UNDER 37 C.F.R. § 42.107**

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I. INTRODUCTION

Patent owner DIRTT Environmental Solutions Ltd. (“DIRTT”) hereby respectfully submits this Preliminary Response to the Petition seeking *inter partes* review of U.S. Patent No. 8,024,901 (the “’901 patent”). Pursuant to 35 U.S.C. § 313 and 37 C.F.R. § 42.107, this Response is being timely filed by November 13, 2015, within three months of the August 13, 2015 mailing date of the Notice granting the Petition a filing date.

A trial should not be instituted in this matter as none of the references relied upon by Petitioners HNI Corporation and Allsteel Inc. (collectively “Petitioner”) in the Petition, either alone or in combination with each other, raise a reasonable likelihood of Petitioner prevailing with respect to any claim of the ’901 patent.

The claims of the ’901 patent are directed to reconfigurable wall systems. The reconfigurable wall systems include discrete modules connected together to form a wall that can be deconstructed and/or reconfigured without demolishing the walls. Each module has opposing vertical frames and horizontal stringers connecting the vertical frames. The horizontal stringers also support decorative tiles or dividers that can be easily switched out or replaced. Adjacent modules are connected together by an innovative flexible connecting strip, or “zipper,” that interacts with beads formed on the vertical supports to hold the modules together.

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