

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.
Petitioner

Patent No. 8,065,156
Issue Date: November 22, 2011
Title: ADAPTIVE INFORMATION PRESENTATION
APPARATUS AND METHODS

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,065,156
PURSUANT TO 35 U.S.C. § 312 and 37 C.F.R. § 42.104**

Case No. IPR2015-01941

TABLE OF CONTENTS

I.	Mandatory Notices (37 C.F.R. § 42.8)	1
II.	Grounds for Standing (37 C.F.R. § 42.104(a)).....	2
III.	Identification of Challenge (37 C.F.R. § 42.104(b)(1)-(3)) and Relief Requested (37 C.F.R. § 42.22(a)(1))	2
A.	Background of the '156 Patent.....	2
1.	The '156 Patent	2
2.	Prosecution History of the '156 Patent	4
B.	Patents and Printed Publications Relied On.....	5
C.	Statutory Grounds for Challenge (37 C.F.R. § 42.104(b)(1)-(2)).....	7
D.	Claim Construction (37 C.F.R. § 42.104(b)(3)).....	7
IV.	How Challenged Claims Are Unpatentable (37 C.F.R. § 42.104(b)(4)-(5))	9
A.	Claims 10, 15, 18, 20, 21, 22, and 23 are Obvious in View of the Combination of Hancock '023 and Lind.....	9
1.	Claim 10	11
2.	Claims 15, 18, 20, 21, 22, and 23	21
3.	Reasons to Combine Hancock '023 and Lind	28
4.	Claim Charts	33
B.	Claim 11 is Obvious in View of the Combination of Hancock '023, Lind, and Boyer	51
1.	Claim 11	52
2.	Reasons to Combine Hancock '023, Lind, and Boyer.....	54
3.	Claim Chart	55
C.	Claim 24 is Obvious in View of the Combination of Hancock '023, Lind, and Class.....	56
1.	Claim 24.....	57
2.	Reasons to Combine Hancock '023, Lind, and Class.....	57
3.	Claim Chart	58
V.	Conclusion	60

LISTING OF EXHIBITS

- Exhibit 1001 U.S. Patent No. 8,065,156 to Gazdzinski
- Exhibit 1002 Declaration of Scott Andrews
- Exhibit 1003 U.S. Patent No. 6,202,023 to Hancock et al.
- Exhibit 1004 *The Network Vehicle - A Glimpse into the Future of Mobile Multi-Media*, by R. Lind et al., The 17th DASC – The AIAA/IEEE/SAE Digital Avionics Systems Conference – Bellevue, WA – Oct. 31-Nov. 7, 1998 – Proceedings
- Exhibit 1005 U.S. Patent No. 6,401,112 to Boyer et al.
- Exhibit 1006 U.S. Patent No. 6,230,123 to Class et al.
- Exhibit 1007 AUTOMOTIVE ELECTRONICS HANDBOOK, Ronald Jurgen (ed.), Chapter 11
- Exhibit 1008 U.S. Patent No. 5,274,560 to LaRue
- Exhibit 1009 David Flynn, *IBM's Corporate High Flier*, THE SYDNEY MORNING HERALD, September 29, 1997
- Exhibit 1010 Suzanne Kantra Kirschner, *Wired Wheels*, POPULAR SCIENCE, March 1998
- Exhibit 1011 “Plaintiff and Counter-Defendant West View Research, LLC’s Revised Disclosure of Asserted Claims and Infringement Contentions, Pursuant to Patent L.R. 3.1 and the June 10, 2015 Court Order,” dated June 26, 2015.
- Exhibit 1012 U.S. Copyright Registration No. TX 4-900-822, “1998 IEEE/AIAA 17th Digital Avionics Systems Conference - Oct 31, 1998 - Bellevue, WA - (98CH36267),” dated

December 8, 1998

- Exhibit 1013 Library of Congress Public Catalog Information, 17th DASC: The AIAA/IEEE/SAE Digital Avionics Systems Conference: Proceedings: [Electronics in motion]: Bellevue, WA, Oct. 31-Nov. 7, 1998
- Exhibit 1014 MARC Tags corresponding to Library of Congress Public Catalog Information, 17th DASC: The AIAA/IEEE/SAE Digital Avionics Systems Conference: Proceedings: [Electronics in motion]: Bellevue, WA, Oct. 31-Nov. 7, 1998
- Exhibit 1015 *The Network Vehicle - A Glimpse into the Future of Mobile Multi-Media*, by R. Lind et al., SAE Technical Paper Series 982901
- Exhibit 1016 U.S. Copyright Registration No. TX 5-149-812, "November 1998 Quarterly Technical Papers on Microfiche (MICQ-N98)," dated June 2, 2000
- Exhibit 1017 U.S. Copyright Office Public Catalog Information, "Quarterly technical papers on microfiche," ISSN 0148-7191
- Exhibit 1018 Society of Automotive Engineers (SAE), Abstract, "The Network Vehicle - A Glimpse into the Future of Mobile Multimedia," Paper No. 982901, <http://papers.sae.org/982901/>
- Exhibit 1019 U.S. Patent Application Pub. No. 2008/0201748 to Hasek et al.
- Exhibit 1020 U.S. Patent No. 6,845,084 to Rangnekar

I. Mandatory Notices (37 C.F.R. § 42.8)

Real Party-in-Interest: Volkswagen Group of America, Inc. (“VWGoA”), which is a subsidiary of Volkswagen AG.

Related Matters: The following judicial matter may affect, or may be affected by, a decision in this *inter partes* review: *West View Research, LLC v. Audi AG, et al.*, No. 3:14-cv-02668-BAS-JLB (S.D. Cal.), in which VWGoA d/b/a Audi of America, Inc., Volkswagen AG (which is the parent of VWGoA, as stated above), and Audi AG (which is a subsidiary of Volkswagen AG) are defendants. In this litigation, West View has accused, for example, an “Audi Q7 with Smart Display Integration” as infringing the claims of U.S. Patent No. 8,065,156 (“the ’156 patent”), which is being challenged by this petition. See, Ex. 1011.

Judicial matters in the Southern District of California against the following defendants may affect, or may be affected by, a decision in this *inter partes* review: BMW (3:14-cv-02670); and Nissan (3:14-cv-02677).

The following administrative matters may affect, or may be affected by, a decision in this *inter partes* review: U.S. Patent Nos. 7,711,565; 7,093,693; 6,988,071; and 6,615,175.

Lead Counsel: Michael J. Lennon (Reg. No. 26,562).

Backup Counsel: Clifford A. Ulrich (Reg. No. 42,194) and Michelle M. Carniaux (Reg. No. 36,098).

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.