UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Koito Manufacturing Co., Ltd. Petitioner

v.

Adaptive Headlamp Technologies, Inc.
Patent Owner

Case IPR2016-00079 Patent 7,241,034

PATENT OWNER'S RESPSONE TO PETITION FOR *INTER PARTES* REVIEW



Case No. IPR2016-00079 Patent No. 7,241,034

TABLE OF CONTENTS

TA	BI	LE OF AUTHORITIES	iv
I.		INTRODUCTION	1
II.		BACKGROUND AND SCOPE OF THE '034 PATENT	4
III		CLAIM INTERPRETATION	6
IV	•	PRIOR ART REFERENCES	7
	A.	KATO	7
	В.	TAKAHASHI	10
	C.	UGUCHI	12
V.		PETITIONER'S FIRST ASSERTED GROUND	12
	A.	Kato is non-analogous prior art which may not be relied upon to pport a finding of obviousness.	15
		1. Kato is addressed to a different field of endeavor than the '034 Patent.	16
		2. Kato is not reasonably pertinent to the problem addressed by the '034 Patent.	20
	B. Ta	There is no motivation to combine Kato with the threshold of kahashi	24
		1. Consideration of Kato in its entirety belies Petitioner's proffered motivation to modify Kato with the threshold of Takahashi	25
		2. Kato teaches against modification to implement a threshold as taught by Takahashi	28
		Claim 7 is patentable over the combination of Kato and Takahashi nee the modified device does not meet all limitations of Independent aim 7	31
VI		PETITIONER'S EIGHTH ASSERTED GROUND	
	A.	Kato is non-analogous prior art which may not be relied upon to pport a finding of obviousness.	37
	B. Ug	There is no motivation to combine Kato with the threshold of guchi	38



Case No. IPR2016-00079 Patent No. 7,241,034

	1. Consideration of Kato and Uguchi in their entireties belies Petitioner's proffered motivation to modify Kato with the threshold of Uguchi	38
	2. Kato teaches against modification to implement a threshold as taught by Uguchi	40
VII.	PETITIONER'S ASSERTED GROUNDS 2-7, 9 AND 10	43
VIII.	CONCLUSION	44
CERT	CIFICATE OF SERVICE	45



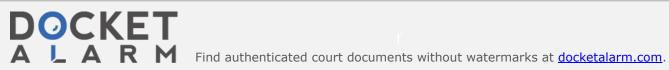
TABLE OF AUTHORITIES

CASES

<i>CFMT</i> , <i>Inc.</i> v. <i>Yieldup Intern. Corp.</i> , 349 F.3d 1333 (Fed. Cir. 2003)	31
Cheese Sys. v. Tetra Pak Cheese & Powder Sys., 725 F.3d 1341 (Fed. Cir. 2013)	32
Ex parte Levengood, 28 USPQ2d 1300 (B.P.A.I. 1993)	24, 37
Graham v. John Deere Co., 383 U.S. 1 (1966)	15
Hartness Int'l, Inc. v. Simplimatic Eng'g Co., 819 F.2d 1100, 1108 (Fed. Cir. 1987)	12, 35
In re Abele, 684 F.2d 902, 910 (CCPA 1982)	12, 35
In re Antle, 444 F.2d 1168 (CCPA 1971)	19
In re Bigio, 381 F.3d 1320, 1325 (Fed. Cir. 2004)	3, 15, 16, 20
<i>In re Clay</i> , 966 F.2d 656 (Fed. Cir. 1992)	15, 20
In re Deminski, 796 F.2d 436 (Fed. Cir. 1986)	16
In re Ellis, 476 F.2d 1370 (CCPA 1973)	17
In re Fine,	



ratent No. 7,241,034	
837 F.2d 1071, 1076 (Fed. Cir. 1988)	2, 35
In re Gordon, 733 F.2d 900 (Fed. Cir. 1984)	3, 29
In re Icon Health and Fitness, Inc., 496 F.3d 1374 (Fed. Cir. 2007)	20
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006)	24
<i>In re Royka</i> 490 F.2d 981 (CCPA 1974)	31
<i>In re Oetiker</i> , 977 F.2d 1443 (Fed. Cir. 1992)	16
In re Ratti, 270 F.2d 810 (CCPA 1959)	29
In re Wood, 599 F.2d 1032 (CCPA 1979)	16
Jones v. Hardy, 727 F.2d 1524 (Fed. Cir. 1984)	32
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)2	4, 37
Panduit Corp. v. Dennison Mfg. Co., 810 F.2d 1561 (Fed. Cir. 1987)	32
Stevenson v. Int'l Trade Comm., 612 F.2d 546 (CCPA 1979)	17
<i>W.L. Gore & Assoc., Inc. v. Garlock, Inc.,</i> 721 F.2d 1540 (Fed. Cir. 1983)	2, 38



DOCKET A L A R M

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.

