

NISSAN 1006

Ryan E. Hatch (SBN 235577)
rhatch@linerlaw.com
Jason L. Haas (SBN 217290)
jhaas@linerlaw.com
LINER LLP
1100 Glendon Avenue, 14th Floor
Los Angeles, California 90024.3518
Telephone: (310) 500-3500
Facsimile: (310) 500-3501

Attorneys for Plaintiff SIGNAL IP, INC.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SIGNAL IP, INC., a California
corporation,

Plaintiff,

vs.

AMERICAN HONDA MOTOR CO.,
INC., a California corporation;
HONDA OF AMERICA MFG, INC.,
an Ohio corporation,

Defendant.

AND RELATED CASES

Case No. 2:14-cv-02454-JAK (JEMx)
(Related to 2:14-cv-02962-JAK
(JEMx); SA CV14-00497-JAK (JEMx);
8:14-cv-00491-JAK (JEMx); 2:14-cv-
02963 JAK (JEMx); 2:14-cv-02457-
JAK (JEMx); 2:14-cv-03111-JAK
(JEMx); LA CV14-03109 JAK (JEMx);
2:14-cv-03107-JAK (JEMx); 2:14-cv-
03113-JAK (JEMx); 2:14-cv-03108-
JAK (JEMx); 2:14-cv-03114-JAK
(JEMx))

**JOINT CLAIM CONSTRUCTION
BRIEF**

Date: March 31, 2015
Time: 8:30 a.m.
Crtrm.: 750

The Hon. John A. Kronstadt

Trial Date: TBD

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION.....	1
II. LEGAL STANDARDS.....	2
A. Defendants’ Statement.....	2
B. Signal’s Statement.....	3
III. DISCUSSION.....	5
A. Defendants’ Statement on Indefiniteness.....	5
B. VWGOA and Bentley’s Statement – Extrinsic Evidence is Not Required to Prove Indefiniteness.....	6
C. Signal’s Statement.....	9
1. Defendants Failed to Meet Their Burden of Proof to Show Indefiniteness.....	9
D. ‘927 Patent.....	13
Defendants’ Summary of ‘927 Patent.....	13
1. Preamble (Claim 1).....	16
(a) Defendants’ Statement.....	16
(b) Honda’s Statement.....	17
(c) Signal’s Statement.....	18
2. “Variable sustain time” (Claims 1 and 2).....	18
(a) Defendants’ Statement.....	18
(b) Signal’s Statement.....	24
3. “Wherein the zone of coverage appears to increase according to the variable sustain time” (Claim 1).....	25
(a) Defendants’ Statement.....	25
(b) VWGoA and Bentley’s Separate Statement.....	31
(c) Honda’s Alternative Construction.....	32
(d) Signal’s Statement.....	34
4. “A threshold time” (Claim 1).....	40
(a) Defendants’ Statement.....	40

(b) Signal’s Statement..... 44

5. “Improving the perceived zone of coverage” (Claim 1) 45

(a) Defendants’ Statement 45

(b) VWGoA and Bentley’s Separate Statement 47

(c) Signal’s Statement..... 48

E. ‘375 Patent 49

Defendants’ Summary of ‘375 Patent 49

6. “Force distribution” (Claim 1)..... 51

(a) Defendants’ Statement 51

(b) Signal’s Statement..... 53

7. “On the passenger seat” (Claim 1) 55

(a) Defendants’ Statement 55

(b) Signal’s Statement..... 58

8. “Seat area” (Claim 1)..... 60

(a) Defendants’ Statement 60

(b) Signal’s Statement..... 64

9. “Sensor array” / “Array of force sensors” (Claim 1)..... 66

(a) Defendants’ Statement 66

(b) Signal’s Statement..... 69

10. “Seat area threshold force” (Claim 1)..... 71

(a) Defendants’ Statement 72

(b) Signal’s Statement..... 74

11. “Concentrated” (Claim 1)..... 75

(a) Defendants’ Statement 75

(b) Signal’s Statement..... 78

F. ‘007 Patent 80

Defendants’ Summary of the ‘007 Patent 80

12. “Seat sensors” (Claims 1, 17, 18 & 19)..... 80

	(a) Defendants’ Statement	80
	(b) Signal’s Statement.....	83
13.	“Lock flag” / “Flag” (Claims 1 & 17)	84
	(a) Defendants’ Statement	85
	(b) Signal’s Statement.....	87
14.	“For a time” / “For a given time” (Claims 1 & 17).....	88
	(a) Defendants’ Statement	88
	(b) Signal’s Statement.....	91
15.	“A second threshold” (Claim 20)	92
	(a) Defendants’ Statement	93
	(b) Signal’s Statement.....	94
16.	“Relative weight parameter” (Claims 1, 17, 20-22).....	95
	(a) Defendants’ Statement	96
	(b) Signal’s Statement.....	99
17.	“Setting” / “Set a lock flag when...” (Claims 1, 17).....	100
	(a) Defendants’ Statement	101
	(b) Signal’s Statement.....	103
18.	“A level indicative of an empty seat” (Claims 1, 17).....	104
	(a) Defendants’ Statement	104
	(b) Signal’s Statement.....	106
19.	“Arrayed in an interface defined by the bottom surface” (Claim 19).....	109
	(a) Defendants’ Statement	110
	(b) Signal’s Statement.....	112
20.	“Means for selectively allowing deployment according to the outputs of seat sensors responding to the weight of an occupant” (Claim 1).....	113
	(a) Defendants’ Statement	114
	(b) Signal’s Statement.....	117

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.