UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC. Petitioner,

v.

WEST VIEW RESEARCH, LLC, Patent Owner.

Case IPR2016-00146 Patent 8,719,038

PATENT OWNER'S PRELIMINARY RESPONSE

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IV	Patent Owner Has Statutorily Disclaimed Claims 1, 4, 16, and 22	21
Lik	Petitioner Has Failed to Meet Its Burden of Showing a "Reasonable kelihood" That Any Challenged Claim of the '038 Patent is Unpatentable Due viousness.	
	A. Petitioner Has Failed to Provide Claim Constructions for Several Key Term Hence the Petition is Fatally Deficient.	
S	B. Petitioner Has Assumed "Broadest Reasonable" Claim Constructions for Several Key Terms that are Unreasonable, Hence the Petition is Fatally Deficient.	35
F	C. Petitioner's Proposed Combination of the References Fail to Teach Each an Every Element of Independent Claims 1, 54, and 66 and Dependent Claims 5 at 2	nd
F	D. Petitioner's Proposed Reasons for Combining the Teachings of the References Rely on Impermissible Hindsight, Hence Petitioner's Obviousness Analysis is Defective.	43
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EXHIBIT LIST

Exhibit 2001	Ulrich Hackenberg's biographical information
Exhibit 2002	Hackenberg explains VW's new infotainment architecture
Exhibit 2003	U.S. Patent No. 5,539,775 to Tuttle et al.
Exhibit 2004	U.S. Patent No. 5,629,981 to Nerlikar
Exhibit 2005	U.S. Patent No. 8,311,834 to Gazdzinski
Exhibit 2006	U.S. Patent No. 8,301,456 to Gazdzinski
Exhibit 2007	Statutory Disclaimer of Claims 1, 4, 16, and 22 of U.S. Patent No. 8,719,038 in compliance with 35 U.S.C. § 253(a)



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