UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.

Petitioner

Patent No. 8,296,146
Issue Date: October 23, 2012
Title: COMPUTERIZED INFORMATION PRESENTATION APPARATUS

PETITIONER'S RESPONSE TO PATENT OWNER'S MOTION TO AMEND

Case No. IPR2016-00156



TABLE OF CONTENTS

I.	Introduction				
II.	The Proposed Claims are not Directed to Patentable Subject Matter				
III.	The Proposed Claims Enlarge the Scope of the Claims of the '146 Patent				
IV.	The Proposed Claims are Indefinite				
V.	The Proposed Claims are not Reasonable				
VI.	The Original Disclosure Does not Support the Proposed Claims				
VII.	The Proposed Substitute Claims are not Patentable Over the Prior Art				
	A.	The Prior Art Describes Claim 35	15		
	B.	The Prior Art Describes Claim 36	18		
	C.	The Prior Art Describes Claim 37	19		
	D.	The Prior Art Describes Claim 38	20		
	E.	The Prior Art Describes Claim 39	20		
	F.	The Prior Art Describes Claim 40	22		
	G.	The Prior Art Describes Claim 41	24		
	Н.	The Prior Art Describes Claim 42	24		
VIII	Conclusion				



LISTING OF EXHIBITS

Exhibit 1001	U.S. Patent No. 8,296,146 to Gazdzinski
Exhibit 1002	Declaration of Scott Andrews
Exhibit 1003	U.S. Patent Application Publication No. 2004/0104842 to Drury et al.
Exhibit 1004	U.S. Patent No. 6,707,421 to Drury et al.
Exhibit 1005	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 1006	U.S. Patent No. 6,230,132 to Class et al.
Exhibit 1007	U.S. Patent No. 6,249,740 to Ito et al.
Exhibit 1008	Redline Comparison of Challenged Independent Claims
Exhibit 1009	AUTOMOTIVE ELECTRONICS HANDBOOK, Ronald Jurgen (ed.), Chapter 11
Exhibit 1010	David Flynn, <i>IBM's Corporate High Flier</i> , The Sydney Morning Herald, September 29, 1997
Exhibit 1011	Suzanne Kantra Kirschner, Wired Wheels, POPULAR SCIENCE, March 1998
Exhibit 1012	"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 1013	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 1014	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	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 1016	The Network Vehicle - A Glimpse into the Future of Mobile Multi-Media, by R. Lind et al., SAE Technical Paper Series 982901
Exhibit 1017	U.S. Copyright Registration No. TX 5-149-812, "November 1998 Quarterly Technical Papers on Microfiche (MICQ-N98)," dated June 2, 2000
Exhibit 1018	U.S. Copyright Office Public Catalog Information, "Quarterly technical papers on microfiche," ISSN 0148-7191
Exhibit 1019	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 1020	U.S. Patent Application Publication No. 2008/0201748 to Hasek et al.
Exhibit 1021	U.S. Patent No. 6,845,084 to Rangnekar



Exhibit 1022	"Order Granting Motions for Judgment on the Pleadings" in <i>West View Research, LLC v. Tesla Motors, Inc.</i> , Case No. 3:14-cv-02679, dated December 11, 2015
Exhibit 1023	"Order Granting Motions for Judgment on the Pleadings" in <i>West View Research, LLC v. Audi AG, et al.</i> , Case No. 3:14-cv-02668 (S.D. Cal.), The March 31, 2016
Exhibit 1024	"Judgment" in West View Research, LLC v. Audi AG, et al., Case No. 3:14-cv-02668 (S.D. Cal.), dated March 31, 2016
Exhibit 1025	"Notice of Appeal" in <i>West View Research, LLC v. Audi AG, et al.</i> , Case No. 3:14-cv-02668 (S.D. Cal.), dated The April 29, 2016
Exhibit 1026	"Notice of Docketing" in <i>West View Research, LLC v. Audi AG et al.</i> , Case No. 16-1947 (Fed. Cir.), dated May 2, 2016
Exhibit 1027	"Order Consolidating Appeals" in West View Research, LLC v. Audi AG, et al., Case No. 16-1947 (Fed. Cir.), date May 9, 2016
Exhibit 1028	ITI HomeLink® Security Interface User Manual
Exhibit 1029	U.S. Patent No. 5,283,559 to Kalendra
Exhibit 1030	U.S. Patent No. 7,640,185 to Giordano
Exhibit 1031	Fancher, <i>In Your Pocket: Smartcards</i> , IEEE Spectrum, vol. 34, issue 2 (Feb. 1997)
Exhibit 1032	U.S. Patent No. 7,114,179 to Ritter
Exhibit 1033	U.S. Patent Application Publication No. 2001/0021950 to Hawley
Exhibit 1034	U.S. Patent No. 6,169,552 to Endo



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.

