

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

Patent No. 8,781,839

Issue Date: July 15, 2014

Title: COMPUTERIZED INFORMATION AND  
DISPLAY APPARATUS

---

**PETITIONER'S REPLY**

Case No. IPR2016-00177

---

## LISTING OF EXHIBITS

Exhibit 1001	U.S. Patent No. 8,781,839 to Gazdzinski
Exhibit 1002	Declaration of Scott Andrews
Exhibit 1003	U.S. Patent No. 6,249,740 to Ito et al.
Exhibit 1004	U.S. Patent No. 6,201,544 to Ezaki
Exhibit 1005	U.S. Patent No. 6,091,956 to Hollenberg
Exhibit 1006	U.S. Patent No. 5,574,443 to Hsieh
Exhibit 1007	U.S. Patent No. 6,064,323 to Ishii et al.
Exhibit 1008	U.S. Patent No. 4,558,300 to Goldman
Exhibit 1009	U.S. Patent No. 6,211,777 to Greenwood et al.
Exhibit 1010	“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 1011	“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 1012	“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 1013	“Judgment” in <i>West View Research, LLC v. Audi AG, et al.</i> , Case No. 3:14-cv-02668 (S.D. Cal.), dated March 31, 2016
Exhibit 1014	“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 1015 “Notice of Docketing” in *West View Research, LLC v. Audi AG et al.*, Case No. 16-1947 (Fed. Cir.), dated May 2, 2016
- Exhibit 1016 “Order Consolidating Appeals” in *West View Research, LLC v. Audi AG, et al.*, Case No. 16-1947 (Fed. Cir.), date May 9, 2016

## TABLE OF CONTENTS

I.	INTRODUCTION .....	1
II.	ARGUMENT .....	2
A.	The Challenged Claims Do Not Require Construction Pursuant to § 112, ¶ 6 .....	2
B.	The Cited Prior Art Renders Unpatentable Each of the Challenged Claims, Under the Broadest Reasonable Construction of Those Claims .....	4
1.	Construction of the term “digitized speech input” was properly presented in the Petition .....	4
2.	Construction of the term “identification of a location” was properly presented in the Petition .....	7
3.	Construction of the term “graphical or visual representation” was properly presented in the Petition .....	9
4.	Construction of the term “identification of a location associated with the organization or entity ... the location being inside of the building or structure” was properly presented in the Petition .....	10
5.	Construction of the term “wireless interface” was properly presented in the Petition .....	13
C.	The Prior Art Describes Claims 1 and 35 .....	15
D.	The Petition Provides Express Reasons to Combine the Cited Prior Art .....	20
III.	Conclusion .....	25

## I. INTRODUCTION

This Petitioner’s Reply is responsive to the Patent Owner’s Response (the “Response”) filed by West View Research, LLC (“WVR”).

As set forth in the Petition, the challenged claims of U.S. Patent No. 8,781,839 (the “’839 patent”) are invalid in view of the prior art cited therein, including U.S. Patent No. 6,249,740 (Exhibit 1003, “Ito”), U.S. Patent No. 6,201,544 (Exhibit 1004, “Ezaki”), U.S. Patent No. 6,091,956 (Exhibit 1005, “Hollenberg”), and U.S. Patent No. 5,574,443 (Exhibit 1006, “Hsieh”).

WVR argues that the Petition fails to construe the terms “digitized speech input,” “identification of a location,” and “graphical or visual representation,” fails to perform an analysis under 35 U.S.C. 112, ¶ 6, and assumes unreasonable constructions for several terms. The Petition, however, stated that the challenged claims should be given their broadest reasonable construction in view of the specification. WVR does not dispute that the challenged claims should be given their broadest reasonable construction, nor does WVR dispute that the specification and prosecution history of the ’839 patent lack special definitions for these claim terms.

WVR further argues that the prior art does not describe all of the limitations of the claims, that the Petition ignores an express teaching away, and that it relies on impermissible hindsight. However, WVR does not present any evidence of

# 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.