UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SL Corporation, Petitioner

v.

Adaptive Headlamp Technologies, Inc.
Patent Owner

Case IPR2016-00193 Patent 7,241,034

PATENT OWNER'S RESPSONE
TO PETITION FOR INTER PARTES REVIEW



TABLE OF CONTENTS

| TABLE OF AUTHORITIES | iii |
|--|-----|
| I. INTRODUCTION | 1 |
| II. BACKGROUND AND SCOPE OF THE '034 PATENT | 4 |
| III. CLAIM INTERPRETATION | 7 |
| IV. PRIOR ART REFERENCES | 8 |
| A. KATO | 8 |
| B. TAKAHASHI | 10 |
| V. PETITIONER'S NINTH ASSERTED GROUND | 12 |
| A. Kato is non-analogous prior art which may not be relied upon to support 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. There is no motivation to combine Kato with the threshold of Takahashi | 24 |
| 1. Consideration of Kato in its entirety belies any motivation to modify Kato with the threshold of Takahashi | 25 |
| 2. Kato teaches against implementation of the threshold of Takahashi. | 29 |
| 3. Modifying Kato with the threshold of Takahashi yields a device unsuitable for performing its intended function of Kato | 31 |
| C. Claim 7 is patentable over the combination of Kato and Takahashi since the modified device does not meet all limitations of claim 7 | 33 |
| VI. CONCLUSION | 37 |
| CERTIFICATE OF SERVICE | 30 |



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| CFMT, Inc. v. Yieldup Intern. Corp., | |
|--|---------------|
| 349 F.3d 1333 (Fed. Cir. 2003) | 33 |
| Cheese Sys. v. Tetra Pak Cheese & Powder Sys., | |
| 725 F.3d 1341 (Fed. Cir. 2013) | 34 |
| Ex parte Levengood, | |
| 28 USPQ2d 1300 (B.P.A.I. 1993) | 24 |
| Graham v. John Deere Co., | |
| 383 U.S. 1 (1966) | 15 |
| Hartness Int'l, Inc. v. Simplimatic Eng'g Co., | |
| 819 F.2d 1100 (Fed. Cir. 1987) | 13 |
| In re Abele, | |
| 684 F.2d 902, 910 (CCPA 1982) | 13 |
| In re Antle, | |
| 444 F.2d 1168 (CCPA 1971) | 20 |
| In re Bigio, | |
| 381 F.3d 1320 (Fed. Cir. 2004) | 3, 15, 16, 20 |
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| 966 F.2d 656 (Fed. Cir. 1992) | 15, 20 |
| In re Deminski, | |
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| In re Ellis, | |
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|--|--------|
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| <i>In re Oetiker</i> , 977 F.2d 1443 (Fed. Cir. 1992) | 16 |
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| <i>In re Wood</i> , 599 F.2d 1032 (CCPA 1979) | 15, 16 |
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| Stevenson v. Int'l Trade Comm., 612 F.2d 546 (CCPA 1979) | 17 |



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|--|---------|
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| 35 U.S.C. § 103 | 15, 33 |
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| 37 C.F.R. § 42.120 | 1 |
| M.P.E.P. § 2131 | 31 |
| M.P.E.P. § 2141 | 3, 15 |
| MPEP 8 21/13 | A 2A 31 |



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