UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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AISIN SEIKI CO., LTD.,

Petitioner,

v.

SIGNAL IP, INC.,

Patent Owner.

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Case IPR2016-00366

Patent 6,012,007

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PATENT OWNER'S RESPONSE

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TABLE OF AUTHORITIES

CASES

STATUTES

EXHIBIT LIST

Exhibit No.	Description
2001	Transcript of deposition of Dr. Rouhana

1. Introduction.

The Board should confirm the patentability of claims 17 and 21 of U.S. Patent 6,012,007 (the "'007 Patent") because *Schousek* fails to teach or suggest allowing deployment of air bags when a relative weight parameter used by a vehicle restraint system is above a first threshold, establishing a lock threshold above the first threshold, and setting a lock flag when the relative weight parameter is above the lock threshold and deployment has been allowed for a given time. As explained below, and contrary to Petitioner's contentions, the minimum weight of an occupied infant seat as used by *Schousek* is not equivalent to the first threshold of the relative weight parameter recited in the challenged claims. This is because in *Schousek,* air bag deployment is not *allowed* when seat sensors detect a weight above that minimum weight of an occupied infant seat. Instead, air bag deployment is inhibited in such circumstances unless other conditions are met.

Further, even if one were to equate the minimum weight of an occupied infant seat as used by *Schousek* with the first threshold of the relative weight parameter recited in the challenged claims, it would still be the case that *Schousek* fails to teach or suggest establishing a lock threshold above the first threshold, and setting a lock flag when the relative weight

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