

UNITED STATES PATENT AND TRADEMARK OFFICE  
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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**PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE TO  
PETITION**

Mail Stop PATENT BOARD  
Patent Trial and Appeal Board  
US Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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**EXHIBIT LIST**

<b>Exhibit</b>	<b>Description</b>
1001	U.S. Patent No. 6,012,007
1002	File History of U.S. Patent No. 6,012,007 ("007 Patent")
1003	U.S. Patent 5,474,327 to Schousek ("Schousek")
1010	Expert Declaration of Dr. Stephen W. Rouhana

## I. INTRODUCTION

On June 13, 2016, the Board instituted trial on claims 17 and 21 of U.S. Patent 6,012,007 (“’007 Patent” or “Patent”), finding a “reasonable likelihood” that Petitioner (“Aisin Seiki” or “Petitioner” will prevail in challenging each of these claims as anticipated under 35 U.S.C. § 102(b) in view of U.S. Patent No. 5,474,327 (“Schousek”) Ex. 1003. None of Patent Owner's (“Signal IP” or “Patent Owner”) arguments to the contrary has merit for the reasons explained in the Petition and herein.

As an initial matter, with the exception of a brief argument on claim construction regarding the lock flag (Section 3. A.) and a further discussion of the first threshold (Section 3. B. *vi.*), the Patent Owner's Response is a nearly verbatim copy of the Patent Owner's Preliminary Response. As set forth below, Petitioner finds no new issues based on the new claim construction issue presented by the Patent Owner and relies on Schousek in the same manner as set forth in the Petition to rebut these newly raised issues. Therefore, Petitioner request that the Board maintain their prior position that claims 17 and 21 are anticipated by Schousek.

## II. SCHOUSEK DISCLOSES THE RECITED FIRST THRESHOLD, LOCK THRESHOLD AND UNLOCK THRESHOLD OF THE RELATIVE WEIGHT PARAMETER

As the Board found in its Institution Decision (Paper 7), Schousek discloses a first threshold, a lock threshold and unlock threshold corresponding to the features recited in claim 17. Additionally, the Board also instituted on the basis that Schousek discloses setting a lock flag and clearing a lock flag as recited in claim 17 of the '007 Patent. The Board's preliminary finding that claims 17 and 21 are anticipated by Schousek should be maintained. It is noted that the Patent Owner has provided no independent arguments related to the features recited in claim 21 so this claim stands or falls with the patentability of claim 17.

### A. Schousek Discloses Three Different Thresholds of a Relative Weight Parameter and Setting and Clearing a Lock Flag

#### 1. The Board's Institution Decision Found Schousek's Thresholds Disclose the Recited Weight Thresholds

The Board noted that Schousek explains “[i]f the total weight parameter is greater than the **maximum infant seat weight** . . . a decision is made to allow deployment,” and “if the total weight parameter is less than the **minimum weight threshold** for an occupied infant seat . . . a decision is made to inhibit deployment.” Paper 7, p. 8, *citing* Ex. 1003 at 5:32–39 (emphasis added). The Board also relied on Schousek to explain “that if the total weight parameter is

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