UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORPORATION
Petitioner
v.

BLITZSAFE TEXAS, LLC
Patent Owner

Patent No. 8,155,342
Issue Date: April 10, 2012
Title: MULTIMEDIA DEVICE INTEGRATION SYSTEM

PATENT OWNER'S RESPONSE PURSUANT TO 37 CFR § 42.120

Case No. IPR2016-00418

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TABLE OF AUTHORITIES

Page(s)

Federal Cases

Other Authorities

EXHIBIT LIST

Exhibit #	Exhibit Name
2001	Declaration of Richard Stern, Ph.D.
2002	Curriculum Vitae of Dr. Richard Stern, Ph.D.
2003	U.S. Patent Application No. 11/071,667 Publication
2004	Declaration of Ira Marlowe
2005	Exhibit M1 to Declaration of Ira Marlowe
2006	Exhibit M2 to Declaration of Ira Marlowe
2007	Exhibit M3 to Declaration of Ira Marlowe
2008	Exhibit M4 to Declaration of Ira Marlowe
2009	Exhibit M5 to Declaration of Ira Marlowe
2010	Exhibit M6 to Declaration of Ira Marlowe
2011	Exhibit M7 to Declaration of Ira Marlowe
2012	U.S. Patent Application No. 11/071,667 (File History application)

I. INTRODUCTION

Patent Owner Blitzsafe Texas, LLC ("Patent Owner") submits the following response under 37 CFR § 42.120 to the Petition filed by Toyota Motor Corporation ("Petitioner") requesting *inter partes* review of certain claims of U.S. Patent No. 8,155,342 ("the '342 Patent"). This filing is timely pursuant to the Board's Scheduling Order and the parties' stipulation extending the deadline to September 30, 2016. (*See*, Paper No. 14, Scheduling Order, and Paper No. 17, Stipulation to Adjust Schedule.)

Patent Owner respectfully submits that the arguments presented and the additional evidence submitted, such as the testimony from Patent Owner's expert, Dr. Richard Stern, Ph.D. (*see, e.g.*, Ex. 2001, Declaration of Dr. Richard Stern, Ph.D.), which demonstrate that certain of the instituted claims are not obvious over combinations based on the Clayton reference for two reasons.

First, Clayton does not teach or disclose an integration subsystem that receives "audio generated by the portable device." This "audio generated by the portable device" limitation is required by each claim and Petitioner points only to Clayton to allegedly teach or disclose this limitation.

The Board had found that the claims require "decoding" of audio by the portable device and the Board found that this "decoding" was taught by the disclosure in Clayton of "playing" audio on the portable device, at least in part

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