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PATENT OWNER RESPONSE

Case IPR2016-00908 Patent No. 5,796,183

Before THOMAS L. GIANNETTI, CARL M. DEFRANCO, and KAMRAN JIVANI, *Administrative Patent Judges*.

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		1.	No Expectation of Success in Combining Gerpheide with Caldwell and Ingraham I			
	C.		tioner Does Not Show That All Elements Exist In The Art en The Claimed Invention Is Viewed As A Whole			
		1.	Claim Element 40(a): an oscillator providing a periodic output signal having a predefined frequency			
		2.	Claim Element 40(b): a microcontroller using the perio output signal from the oscillator, the microcontroller	dic		



		selectively providing signal output frequencies to a pluralit of small sized input touch terminals of a keypad	•	
		3. Claim Element 40(c): plurality of small sized input touch terminals/closely spaced array of small sized input touch terminals	39	
		4. Claim Element 40(d): a detector circuit coupled to said oscillator for receiving said periodic output signal from said oscillator, and coupled to said input touch terminals, said detector circuit being responsive to signals from said oscillator via said microcontroller and a presence of an operator's body capacitance to ground coupled to said touch terminals when proximal or touched by the operator to provide a control output signal		
		5. Claim Element 40(e): wherein said predefined frequency of said oscillator and said signal output frequencies are selected to decrease a first impedance of said dielectric substrate relative to a second impedance of any contaminat and wherein said detector circuit compares a sensed body capacitance change to ground proximate an input touch terminal to a threshold level to prevent inadvertent generation of the control output signal	te	
	D.	The Remaining Arguments Also Fail Under Petitioner's Flawed Analysis of Claim 40.		
		1. Independent Claim 61		
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