

H&S Manufacturing Company, Inc.

V.

Oxbo International Corporation

IPR2016-00950

Patent 8,166,739 B2

**PETITIONER'S  
DEMONSTRATIVES**

H&S Mfg. Co. v. Oxbo Int'l Corp.  
IPR2016-00950  
Petitioner H&S Ex. 1032

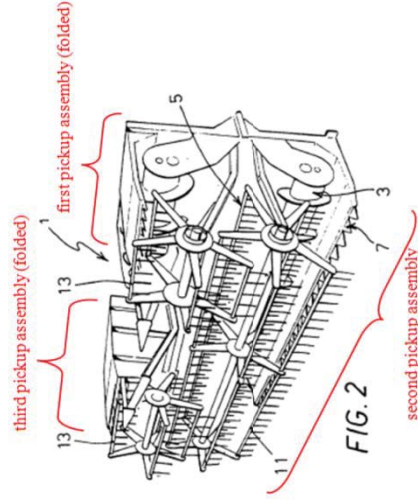
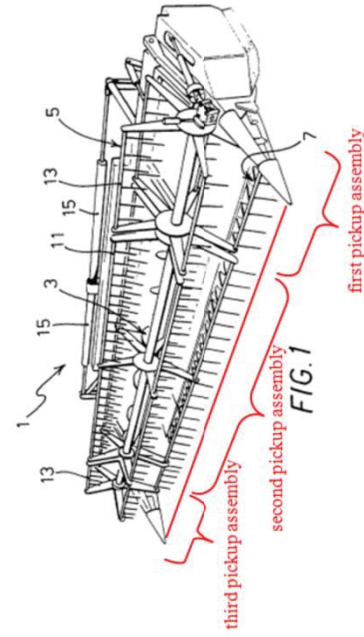
H&S Mfg. Co. Inc.  
Exhibit 1032

# Outline of Argument

- The instituted Ground should be maintained.
- The Board's claim construction is correct.
- Patentee's expert testimony is flawed because it is based on improper claim constructions.
- Patentee does not overcome the reasoned rationale for combining the references.

# The Ground based on Declementi should be maintained

Declementi – Harvester with 3 Foldable Pickup Assemblies  
Petition, pp. 36-37.



US Honey – Windrower with 3 Independent Belt Conveyers

US Honey discloses a third conveyor driven by a third motor, e.g., “belt conveyors 27, 28 and 29 having individual drives (not shown).” Ex. 1017, 4: 27-28.

Petition, p. 35.

Lohrentz – Harvester/Windrower used to merge windrows

“The present invention relates to harvesters, and, more particularly, to hay harvesting equipment of the type that is capable of producing a pair of windrows (double windrows) on top of one another, side-by-side, or merged into one large windrow” Ex. 1016, 1:5-9.

Petition, p. 33.

## No Express Claim Constructions Are Necessary

“For purposes of this decision, we determine that no express construction is necessary for ‘conveyor’ or any other *claim term*, and apply the ordinary and customary meaning of each term.” (Decision, pg.8, emphasis added).

Reply, p. 2.

# Patentee Argued Against Claim Constructions

“Precisely how the side by side aligned pickup assemblies accomplish this, including the spacing of the tines, is *not limited by the claim, and should not be limited by the Board.*”  
(Preliminary Response, pg.14, emphasis added).

Reply, p. 10.

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