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BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANON INC.; CANON USA, INC.; CANON FINANCIAL SERVICES, INC.; FUJIFILM CORPORATION; FUJIFILM HOLDINGS AMERICA CORPORATION; FUJIFILM NORTH AMERICA CORPORATION; JVC KENWOOD CORPORATION; JVCKENWOOD USA CORPORATION; NIKON CORPORATION; NIKON INC.; OLYMPUS CORPORATION; OLYMPUS AMERICA INC.; PANASONIC CORPORATION; PANASONIC CORPORATION OF NORTH AMERICA; SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA, INC. Petitioners,

v.

PAPST LICENSING GMBH & CO. KG Patent Owner.

> Case IPR2016-01211 Patent 8,504,746

PAPST LICENSING GMBH & CO. KG'S PATENT OWNER RESPONSE

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	B.	Petitioners Fail To Demonstrate The Challenged	
		Claims Are Obvious Over Kawaguchi In View Of	
		Matsumoto	
		1. Petitioners fail to articulate a proper obviousness ground	
		2. Kawaguchi's Device Uses A Particular	
		Separated Data Read Unit And Data Write	
		Unit Configuration Set Up To Be A Data	
		Relay That Cannot Support A File System	
		3. Independent claim 1 requires the digitized analog data to be stored in a file system of the	
		data storage memory as at least one file and	
		the analog data acquisition device's	
		processor to execute at least one other	

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	instruction set to allow transfer of the file to the computer
4.	Just because Kawaguchi mentions RAM does not mean digitized analog data is stored in the data read unit as digitized analog data or as a file
5.	Otherwise modifying Kawaguchi's separate data read and write units to be able to support a file system defeats a stated purpose of Kawaguchi's design and would worsen its performance
6.	Matsumoto provides no additional motivation to modify Kawaguchi to overcome the reasons not to so modify Kawaguchi and if you looked to Matsumoto's file system, it requires specialized file transfer enabling software stored on the computer, which is prohibited
7.	by the claims
	 (i) Fourth Element: "wherein the processor is configured and programmed to implement a data generation process by which analog data is acquired from the analog signal acquisition channel, the analog data is processed and digitized, and the processed and digitized analog data is stored in a file system of the data storage memory as at least one file of digitized analog data"
	(ii) Sixth Element of Claim 1: "f) wherein the processor is further configured and programmed to execute at least one

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other instruction set stored in the program memory to thereby allow the at least one file of digitized analog data from the acquired analog signal acquisition channel to be transferred to the computer using the device driver corresponding to said class of devices so that the analog data acquisition device appears to the computer as if it were a whereby there is no requirement for any (iii) user-loaded file transfer enabling software to be loaded on or installed in the computer in addition to the operating Kawaguchi in view of Matsumoto Fails To Render Independent Claim 31 Obvious...... 38 (i) Second Element: "wherein the processor configured to control is a data generation process by which analog data is acquired from the analog source, the analog data is processed and digitized, and the processed and digitized analog data is stored in the memory as digitized Fourth Element: "wherein the processor (ii) is configured to automatically transfer the digitized analog data acquired from the analog source to the host device in response to a digital mass storage device data read signal from the host device, in a manner that causes the analog data acquisition and interface device to appear to be the mass storage device, while using the device driver associated with the mass storage device to perform

8.

	the automatic transfer without requiring any user-loaded file transfer enabling software to be loaded on or installed in the computer"	
9.	Independent Claim 34	41
	(i) Second Element: "acquiring analog data from an analog source, processing and digitizing the analog data, and storing the processed and digitized analog data in the memory as digitized analog data under control of the processor"	41
	(ii) Fourth Element: "automatically transferring data from the analog source to the host device in response to a digital data read command from the host device, in a manner that causes the analog data acquisition device to appear to be a digital device instead of as an analog data acquisition device, while using the device driver to perform the automatic transfer of the acquired digitized analog data to the host device without requiring any user-loaded file transfer enabling software to be loaded on or installed in the host device"	42
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	Claims	42
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	 (ii) Claims 7 and 26: "wherein the analog source comprises a data transmit/receive device and "wherein the analog source is 	

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