UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.

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 PRELIMINARY RESPONSE

Case No. IPR2016-01445



TABLE OF CONTENTS

I.	INTF	INTRODUCTION		
II.	SUMMARY OF ARGUMENTS			
III.	CLAIM CONSTRUCTION			
IV.	CLA	CLAYTON IS NOT PRIOR ART7		
V.	THE PETITION SUFFERS FROM EVIDENTIARY DEFICIENCIES			
	A.	The Alleged Grounds Rely On Unfiled Prosecution History "Evidence"	27	
	B.	The Andrews Declaration Is Fatally Deficient	29	
VI.	PETITIONER HAS NOT DEMONSTRATED A REASONABLE LIKELIHOOD OF SUCCESS FOR THE GROUNDS ADVANCED IN THE PETITION AND THE PETITION SHOULD BE DENIED		31	
	A.	Requirements for Showing Obviousness Under 35 U.S.C. § 103.	31	
	B.	The Petition Fails to Address Each Claim Element of Independent Claims 49, 73, 97, and 120.	33	
	C.	Independent Claims 49, 73, 97, and 120 Are Not Obvious Because the Proposed Combinations Fail to Establish Fundamental Requirements	40	
	D.	Independent Claims 49, 73, 97, and 120 Are Not Obvious Over the Silvester Combination	43	
	E.	Dependent Claims 50-57, 62-64, 66, 68, 70, 71, 74-80, 94, 95, 99-103, 106, 109-111, 113, 115 Are Not Obvious	46	
VII	CON	CLUSION	46	



TABLE OF AUTHORITIES

	Page(s)
Cases	
Apple, Inc. v. Contentguard Holdings, Inc., IPR2015-00355 (PTAB, June 26, 2015)	31
C.B. Distributors, Inc. v. Fontem Holdings 1 B.V., IPR2013-00387 (PTAB, Dec. 24, 2014)	32
Cisco Sys., Inc., v. C-Cation Techs., LLC, IPR2014-00454 (PTAB, Aug. 29, 2014)	32
GN Resound A/S v. Oticon A/S, IPR2015-00103 (PTAB, June 18, 2015)	4, 38
Graham v. John Deere Co., 383 U.S. 1 (1966)	passim
Indus. v. Zipshade Indus., IPR2015-00488 (PTAB, July 24, 2015)	32
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006)	31
KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)	passim
Plant Science, Inc. v. The Andersons, Inc., IPR2014-00939 (PTAB, Dec. 17, 2014)	32
Wright Medical Technology, Inc. v. Orthophoenix, LLC, IPR2014-00912 (PTAB, Dec. 16, 2014)	3, 29
Zimmer Biomet Holdings, Inc. v. Four Mile Bay, LLC, IPR2016-00011 (PTAB, April 1, 2016)	3, 29
Statutes	
35 U.S.C. § 103	31
35 U.S.C. § 314(a)	6



IPR2016-01445 PATENT NO. 8,155,342

Other Authorities

37 CFR § 42.6(a)(3)	2, 5, 29, 32
37 CFR § 42.22(a)(2)	4, 33
37 CFR § 42.63(a)	2, 28
37 CFR § 42.104(b)(4)	4 5 33 38



EXHIBIT LIST

Exhibit #	Exhibit Name
2001	U.S. Pat. App. No. 11/071,667 Published as U.S. Pat. App. Pub.
	No. 2005/0239434
2002	IPR2016-00418 Decision
2003	IPR2016-00419 Decision



DOCKET A L A R M

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

