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. 7,489,786
Issue Date: Feb. 10, 2009
Title: AUDIO DEVICE INTEGRATION SYSTEM

BLITZSAFE TEXAS, LLC'S PRELIMINARY RESPONSE TO PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 7,489,786

Case No. IPR2016-01448



IPR2016-01448 PATENT NO. 7,489,786

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Page(s) **Federal Cases** Apple, Inc. v. Contentguard Holdings, Inc., C.B. Distributors, Inc. v. Fontem Holdings 1 B.V., IPR2013-00387 (PTAB, Dec. 24, 2014)9 Cisco Sys., Inc., v. C-Cation Techs., LLC, *GN Resound A/S v. Oticon A/S*, Graham v. John Deere Co., In re Kahn, KSR Int'l Co. v. Teleflex Inc., 550 U.S. 398 (2007)......3, 8, 9, 25, 26 Plant Science, Inc. v. The Andersons, Inc., Toyota Motor Co. v. Blitzsafe Texas, LLC, Whole Space Indus. v. Zipshade Indus., **Federal Statutes**



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Other Authorities

37 C.F.R. § 42.6(a)(3)	3, 4, 9
37 C.F.R. § 42.104	6
37 C.F.R. § 42.104(b)	4
37 CFR 42.65(a)	26
37 CFR § 42.63(a)	6
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EXHIBIT LIST

E 1:1:4 #	TO 1 °1 °4 NT
Exhibit #	Exhibit Name
	Joint Claim Construction Chart from <i>Blitzsafe v. Honda</i> 15-cv-
2001	
	01274 (consolidated) (E.D. Tex.)
	Volkswagen's Motion to Stay from <i>Blitzsafe v. Honda</i> 15-cv-
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