

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

American Honda Motor Co., 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. IPR2016-01472

---

**TABLE OF CONTENTS**

	<b>Page No(s).</b>
I. INTRODUCTION .....	1
II. CLAIM CONSTRUCTION .....	3
III. PETITIONER HAS NOT DEMONSTRATED A REASONBLE LIKELIHOOD OF SUCCESS FOR ANY OF GROUNDS 1-4 AND THE PETITION SHOULD BE DENIED. ....	4
A. Requirements for Showing Obviousness Under 35 U.S.C. § 103. ....	4
B. Claims 57, 60, 61, 64, and 65 Are Not Obvious over Bhogal, Berry, and Onishi (Ground 1) .....	6
1. Bhogal, Berry, and Onishi Fail to Teach or Disclose the “First” and “Second” “Electrical Connections” Required by the Claims .....	6
2. Bhogal, Berry, and Onishi Fail to Teach or Disclose the “Pre-Programmed Code Portion” for “Command Conversion” Required by the Claims .....	8
3. Bhogal, Berry, and Onishi Fail to Teach or Disclose the “Device Presence Signal” Required by the Claims .....	12
4. Bhogal, Berry, and Onishi Fail to Teach or Disclose the “Data Conversion” Pre-programmed Code Portion (Claims 60 and 61).....	16
C. Claim 62 Is Not Obvious over Bhogal, Berry, Onishi, and Ohmura (Ground 2) .....	17
D. Claims 64 and 65 Are Not Obvious over Bhogal, Berry, Onishi, and Okagaki (Ground 3).....	18
E. Claims 1, 6, 7, 10, and 14 Are Not Obvious over Bhogal, Onishi, and Owens (Ground 4) .....	18

1.	Owens does not teach or disclose “a third connector that is electrically connected to one or more auxiliary input sources external to the car stereo and the after-market audio device” or “a code portion in the microcontroller within the interface for switching to one or more auxiliary input sources connected to the third electrical connector” .....	19
F.	Claim 5 Is Not Obvious over Bhogal, Onishi, Owens, and Berry (Ground 5) .....	21
G.	Claim 8 Is Not Obvious over Bhogal, Onishi, Owens, and Ohmura (Ground 6) .....	22
H.	Claim 10 Is Not Obvious over Bhogal, Onishi, Owens, and Knobl (Ground 7) .....	23
I.	Claims 1, 6, 7, 10, 14, 57, 60, 61 Are Not Obvious over JP '954, Onishi, and Owens (Ground 8) .....	23
J.	Claim 5 Is Not Obvious over JP '954, Onishi, Owens, and Berry (Ground 9) .....	27
K.	Claims 8 and 62 Are Not Obvious over JP '954, Onishi, Owens, and Ohmura (Ground 10) .....	28
L.	Claims 64 and 65 Are Not Obvious over JP '954, Onishi, Owens, and Okagaki (Ground 11) .....	29
IV.	CONCLUSION .....	29

**TABLE OF AUTHORITIES**

	<b>Page(s)</b>
<b>Federal Cases</b>	
<i>Apple, Inc. v. Contentguard Holdings, Inc.</i> , IPR2015-00355 (PTAB, June 26, 2015) .....	6
<i>Callaway Golf Co. v. Acushnet Co.</i> , 576 F.3d 1331 (Fed. Cir. 2009) .....	19, 20, 24, 25, 29, 30, 31
<i>Cisco Sys., Inc., v. C-Cation Techs., LLC</i> , IPR2014-00454 (PTAB, Aug. 29, 2014) .....	7
<i>Graham v. John Deere Co.</i> , 383 U.S. 1 (1966).....	4, 5, 6
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006) .....	6
<i>KSR Int’l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	6, 7
<i>Plant Science, Inc. v. The Andersons, Inc.</i> , IPR2014-00939 (PTAB, Dec. 17, 2014) .....	7
<i>Toyota Motor Corporation v. Blitzsafe Texas, LLC</i> , IPR2016-00421 (PTAB, July 6, 2016) .....	5, 23
<i>Whole Space Indus. v. Zipshade Indus.</i> , IPR2015-00488 (PTAB, July 24, 2015) .....	6, 7
<b>Federal Statutes</b>	
35 U.S.C. § 103 .....	5
35 U.S.C. § 314(a) .....	5

**Other Authorities**

37 C.F.R. § 1.75(c).....*passim*  
37 C.F.R. § 42.6(a)(3).....5, 7  
37 C.F.R. § 42.104(b) .....4

# 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.