UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR COMPANY LTD., HYUNDAI MOTOR AMERICA, HYUNDAI MOTOR MANUFACTURING ALABAMA LLC, KIA MOTORS CORPORATION, KIA MOTORS AMERICA, INC., AND KIA MOTORS MANUFACTURING GEORGIA, INC.

Petitioners

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. IPR2016-01476

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF CONTENTS

Page No(s).

I. INTRODUCTION 1

II. SUMMARY OF ARGUMENTS 1

III. PETITIONER'S CLAIM CONSTRUCTIONS AND PRIORITY STATEMENT ARE ERRONEOUS 5

IV. THE PETITION SHOULD BE DENIED BECAUSE PETITIONERS HAVE NOT DEMONSTRATED A REASONABLE LIKELIHOOD OF SUCCESS FOR GROUNDS 1-5 6

A. Ground 1 Should Be Denied Institution Because the Challenged Claims Are Not Anticipated By Shibasaki 6

B. Requirements for Showing Obviousness Under 35 U.S.C. § 103. 13

C. Grounds 2-5 Should Not Be Instituted Because Petitioners Fail To Establish Fundamental Requirements for Proving Obviousness 16

D. Ground 2 Should Not Be Instituted Because the Challenged Claims Are Not Obvious Over Shibasaki and the Knowledge of a Person of Ordinary Skill in the Art 17

E. Ground 3 Should Not Be Instituted Because the Tong Reference Is Not Offered To Disclose, Nor Does Tong Disclose, "Audio Generated By the Portable Device" and "the Interface Subsystem" As Required By the Challenged Claims 19

F. Ground 4 Should Not Be Instituted Because the AVRCP 1.0 Reference Is Not Offered To Disclose, Nor Does AVRCP 1.0 Disclose, "Audio Generated By the Portable Device" and "the Interface Subsystem" As Required By the Challenged Claims 20

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

G. Ground 5 Should Not Be Instituted Because the AD2P 1.0 Reference Is Not Offered to Disclose, Nor Does AD2P 1.0 Disclose, "the Interface Subsystem," and AD2P 1.0 Does Not Disclose "Audio Generated by the Portable Device" as Required by the Challenged Claims.....21

V. CONCLUSION.....23

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

TABLE OF AUTHORITIES

Page(s)

Cases

Apple, Inc. v. Contentguard Holdings, Inc.,
IPR2015-00355 (PTAB, June 26, 2015) 14

C.B. Distributors, Inc. v. Fontem Holdings 1 B.V.,
IPR2013-00387 (PTAB, Dec. 24, 2014) 15

Cisco Sys., Inc., v. C-Cation Techs., LLC,
IPR2014-00454 (PTAB, Aug. 29, 2014).....15

GN Resound A/S v. Oticon A/S,
IPR2015-00103 (PTAB, June 18, 2015) 2

Graham v. John Deere Co.,
383 U.S. 1 (1966).....4, 13, 15, 16

Indus. v. Zipshade Indus.,
IPR2015-00488 (PTAB, July 24, 2015) 14

In re Kahn,
441 F.3d 977 (Fed. Cir. 2006) 14

KSR Int'l Co. v. Teleflex Inc.,
550 U.S. 398 (2007).....14, 15, 16

Plant Science, Inc. v. The Andersons, Inc.,
IPR2014-00939 (PTAB, Dec. 17, 2014) 15

Richardson v. Suzuki Motor Co.,
868 F.2d 1226 (Fed. Cir. 1989) 6

Toyota Motor Corporation, v. Blitzsafe Texas, LLC,
IPR2016-00419 (PTAB, August 31, 2016) 11

Unified Patents Inc., v. Blitzsafe Texas, LLC,
IPR2016-00118 (PTAB, April 27, 2016) 11, 12

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

Verdegaal Bros. v. Union Oil Co. of California,
814 F.2d 628 (Fed. Cir. 1987) 6

Statutes

35 U.S.C. § 102(b) 6

35 U.S.C. § 103 .....8, 13

35 U.S.C. § 314(a) 4

Other Authorities

37 C.F.R. § 42.6(a)(3) 4, 14

37 C.F.R. § 42.22(a)(2) 1, 2

37 C.F.R. § 42.104(b)(4).....1, 2, 3

DOCKET ALARM
Find authenticated court documents without watermarks at docketalarm.com.

DOCKET ALARM

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.