
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROADSIGN INTERNATIONAL, LLC
Petitioners

v.

T-REX PROPERTY AB,
Patent Owner

U.S. Patent No. RE39,470

Inter Partes Review Case No. 2016-01869

**T-REX PROPERTY AB'S PATENT OWNER
PRELIMINARY RESPONSE PURSUANT TO 37 CFR §42.107(a)**

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 1. Petitioners fail to demonstrate that the Nakamura-Loban combination renders obvious the limitation “dynamically updating an exposure list” (claims 1-3, 5-9, 12-14, 17-21, and 24).....6

 2. Petitioners fail to demonstrate that the Nakamura-Loban combination renders obvious the limitation “interrupting said display of material by said select projectors when said display is hidden, obstructed, or otherwise visibly unavailable in said public place” (claim 3).13

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EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Zaydoon Jawadi
2002	Curriculum Vitae of Zaydoon Jawadi
2003	Excerpts from Microsoft Computer Dictionary Fourth Edition (1999)

TABLE OF AUTHORITIES

Page(s)

Cases

Stumbo v. Eastman Outdoors, Inc.,
508 F.3d 1358 (Fed. Cir. 2007)5

Other Authorities

32 C.F.R. §42.107(a).....3

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