UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

REACTIVE SURFACES LTD., LLP
Petitioner

v.

TOYOTA MOTOR CORPORATION
Patent Owner

CASE: IPR2016-01914

Patent No. 8,394,618 B2

REPLY DECLARATION OF DR. DAVID ROZZELL IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,394,618 B2



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	A.	It was well-known prior to the filing date of the '618 patent that fingerprints contain components degradable by a lipase, and a POSITA with a general knowledge of lipases would have known that a lipase would be capable of degrading those components to products of lower molecular weight and greater volatility
	B.	Buchanan is analogous art and pertinent to the field of endeavor16
	C.	Mong, a reference cited and described in detail in the Dordick Declaration, supports the conclusions of Buchanan
	D.	Buchanan was a "printed publication" and accessible prior to the filing date of the '618 patent
	E.	A POSITA with knowledge of Buchanan and/or Mong and a general knowledge of lipases would have had a reasonable expectation of success in facilitating the removal of a fingerprint (as defined by the Patent Owner) from a lipase-associated surface or coating by vaporization
	F.	In arriving at a conclusion of obviousness regarding the claims of the '618 patent, I did not rely exclusively on Buchanan as alleged in the Patent Owner's Response
	G.	The distinction made by the Patent Owner between latent and patent fingerprints does not render irrelevant the prior art work showing that fingerprints having more volatile components disappear more rapidly by vaporization
	Н.	Buchanan's results are mischaracterized in the Patent Owner's Response



I.	There is no convincing evidence that factors other than the	
	vaporization of more volatile components were responsible for t	he
	observations reported by Buchanan	20



ATTACHMENTS:

- A. Résumé of Dr. David Rozzell
- B. "Immobilization of Enzymes by Covalent Attachment." Chapter 20 in "Methods in Biotechnology, Vol. 17: Microbial Enzymes and Biotransformations," edited by J. L. Barredo and published by Humana Press, Inc. Totowa, NJ, 2005. (Ex. 1049)
- C. "Immobilization of Enzymes: Techniques and Applications," Chapter 13 in "Biocatalytic Production of Amino Acids and Derivatives: New Developments and Process Considerations," Hanser Publishers, 1992. (Ex. 1050)
- D. "Immobilized Aminotransferases for Amino Acid Production": J. David Rozzell., **1987**. Methods in Enzymology, 137, 479-497. (Ex. 1051)
- E. Ramotowski, R.S., in Advances in Fingerprint Technology, Chapter 3, pages 63-104. Henry C Lee and R. E. Gaensslen, eds., CRC Press, Boca Raton, 2001 (Ex. 1024)
- F. Wang, US Patent Appl. 2008/0119381 A1, Published May 22, 2008 (Ex. 1025)
- G. He et al, Biochemical Engineering Journal 2000. 6, 7-11. (Ex. 1026)
- H. Kim et al, Biotech. Bioeng. 2001. 72, 475-482. (Ex. 1027)
- I. Enzyme Nomenclature **1984**, published in 1984, Academic Press, New York, pages 270-279 (Ex. 1028)
- J. Asano et al, J Forensic Sci. **2002**. 47, 1-3. (Ex. 1029)
- K. Antoine et al, J Forensic Sci. 2010. 55, 513-518. (Ex. 1030)
- L. World Patent Application WO 2007017701 A1, Publication date February 15, 2007. (Ex. 1031)
- M. Science News Article, April 15, 1997, printed copy from web site (Ex. 1032)
- N. Menzel, **1999** in "Fingerprint Detection with Lasers", Chapter 7, pages 160, 178, reference 22 (Ex. 1033)



- O. Bartick et al, **2002**. 16th Meeting of the International Association of Forensic Sciences, Page 61-64. (Ex. 1034)
- P. Jain et al, **2004**. Proceedings of Biometric Authentication Workshop, LNCS 3087, pages 259-269. (Ex. 1035)
- Q. Drozdowski et al, 1969. J Am Oil Chem. Soc., 46, 371-376. (Ex. 1036)



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