
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. 7,382,334
Issue Date: June 3, 2008
Title: DIGITAL INFORMATION SYSTEM

Inter Partes Review Case No. 2017-00006

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

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III. CLAIM CONSTRUCTION 2

 A. “update said exposure list in real time with control instruction fields via dynamic booking of information in time for exposure from mediators” (claim 1, 22) / “update an exposure list having control instruction fields, via dynamic booking of display information from mediators” (claim 11, 32) 3

IV. THERE IS NO REASONABLE LIKELIHOOD OF PETITIONERS PREVAILING AS TO A CHALLENGED CLAIM OF THE '334 PATENT. 6

 A. Ground 1: Petitioners Failed To Demonstrate That Nakamura Anticipates Claims 1-3, 8, 11-14, 19, 22-24, 29, 32-35, or 40. 6

 1. Petitioners fail to demonstrate that the Nakamura discloses the limitations “update said exposure list in real time with control instruction fields via dynamic booking of information in time for exposure from mediators” (claims 1-3, 8, 22-24, 29) or “update an exposure list having control instruction fields, via dynamic booking of display information from mediators” (claims 11-14, 19, 32-35, 40) 6

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1. Holtey does not cure the deficiencies in Nakamura.16

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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)6

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32 C.F.R. §42.107(a).....2

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