

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

EMERSON ELECTRIC CO,
Petitioner

v.

SIPCO, LLC,
Patent Owner

Case IPR2015-01973
U.S. Patent 8,013,732

SIPCO, LLC'S PATENT OWNER PRELIMINARY RESPONSE
PURSUANT TO 37 C.F.R. § 42.107(a)

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I. INTRODUCTION

The Board should deny the present request for *inter partes review* of U.S. Patent No. 8,013,732 (“the ’732 patent”) because there is not a reasonable likelihood that the Petitioner would prevail at trial with respect to at least one claim of the ’732 patent for three separate and independent reasons.

The Board should not cancel any of the challenged claims because one or more of the limitations required by each of those claims would not have been obvious to one of ordinary skill in the art.¹ For example, a system for remote wireless communication comprising a device having a transceiver that is configured to wirelessly retransmit i) select information, ii) identification information of a nearby transceiver, and iii) its own identification information, as required by challenged independent claims 13 and 20 would not have been obvious to one of ordinary skill in the art.

Additional claim limitations from the challenged claims would also not have been taught by the prior art including: i) a data controller operatively coupled to a transceiver and a sensor, ii) the data controller providing a control signal to an actuator for implementation of a command, and iii) an actuator

¹ *Infra*, § VI.

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