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

KAWASAKI RAIL CAR, INC. Petitioner,

v.

SCOTT BLAIR, Patent Owner.

Case No. IPR2017-01036

Patent No. 6,700,602

Issue Date: March 2, 2004

Title: Subway TV Media System

# PETITIONER'S RESPONSE TO PATENT OWNER'S OBJECTIONS TO PETITIONER'S SUPPLEMENTAL REPLY BRIEF



Pursuant to the Board's June 28, 2018 Order (Paper 48), Petitioner Kawasaki Rail Car, Inc. respectfully submits this response to Patent Owner's Notice of Objection to Reply Brief Arguments and Material (Paper 49). Petitioner's response below lists the page and line numbers of Patent Owner's Supplemental Response (Paper 45) ("Supp. Resp.") to which the objected page and line numbers of Petitioner's Supplemental Reply (Paper 47) ("Supp. Reply") are responsive:

• 21:15-19 of Supp. Reply: 43:9-13, 43:16-44:4 of Supp. Resp.

• 22:3-7 of Supp. Reply: 44:5-11 of Supp. Resp.

• 22:10-14 of Supp. Reply: 44:12-45:9 of Supp. Resp.

• 23:Fig. 1 of Supp. Reply: 44:12-45:9 of Supp. Resp.

• 23:4-8 of Supp. Reply: 46:11-16 of Supp. Resp.

• 24:Fig. 2 of Supp. Reply: 46:11-16 of Supp. Resp.

• 24:1-10 of Supp. Reply: 46:14-16 of Supp. Resp.



#### Dated: July 5, 2018

## Respectfully submitted,

### /s/ Mark A. Chapman

Sheila Mortazavi (Reg. No. 43,343)

Lead Counsel

Mark A. Chapman (admitted *pro hac vice*)

Backup Counsel

Zaed M. Billah (Reg. No. 71,418)

**Backup Counsel** 

Armin Ghiam (Reg. No. 72,717)

**Backup Counsel** 

Hunton Andrews Kurth LLP

One Broadway

New York, NY 10004

Telephone: (212) 425-7200

Fax: (212) 425-5288

Email: SMortazavi@HuntonAK.com

MChapman@HuntonAK.com ZBillah@HuntonAK.com

AGhiam@HuntonAK.com



#### **CERTIFICATE OF SERVICE**

The undersigned certifies that on <u>July 5, 2018</u>, a complete and entire copy of

#### this PETITIONER'S RESPONSE TO PATENT OWNER'S OBJECTIONS

#### TO PETITIONER'S SUPPLEMENTAL REPLY BRIEF was provided via

email to the Patent Owner by serving at the following address:

Jennifer Meredith (Reg. No. 47,790) Meredith & Keyhani, PLLC 205 Main Street East Aurora, New York 14052

Tel: (212) 760-0098 Fax: (212) 202-3819

jmeredith@meredithkeyhani.com

/s/ Armin Ghiam

Armin Ghiam Hunton Andrews Kurth LLP One Broadway New York, NY 10004 Telephone: (212) 425-7200

