UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DENSO CORPORATION, DENSO INTERNATIONAL AMERICA, INC., ASMO CO. LTD., AND TOYOTA MOTOR CORPORATION, Petitioners,

v.

INTELLECTUAL VENTURES II LLC, Patent Owner.

> Case IPR2017-01631 U.S. Patent No. 7,067,952

PATENT OWNER'S RESPONSE PURSUANT TO 37 C.F.R. § 42.120(a)

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III.		Calsonic Grounds: Petitioners Failed To Prove That Calsonic closes The Claimed "bridge"
	А.	Petitioners did not prove that the Calsonic "deformable portions 12a" are a bridge "formed by interconnecting two mating sections"
	В.	Petitioners do not assert that Calsonic's "hinge" discloses a bridge "to link adjacent segments into a continuous strip"
IV.		DENSO Ground: Petitioners Failed to Prove that Claims 10, 12, 14 Are Unpatentable Over DENSO and Calsonic
	A.	Petitioners Failed to Prove that DENSO or Calsonic Disclose the Claimed "bridge"
	B.	Petitioners Failed to Prove that DENSO Discloses "a plurality of discrete stator segments"

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TABLE OF AUTHORITIES

Cases

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<i>Microsoft Corp. v. Proxyconn, Inc.,</i> 789 F.3d 1292 (Fed. Cir. 2015)10
<i>Phillips v. AWH Corp.</i> , 415 F.3d 1303 (Fed. Cir. 2005) (en banc)11
<i>Poly-America, L.P. v. API Indus., Inc.,</i> 839 F.3d 1131 (Fed. Cir. 2016)
<i>In re Translogic Tech., Inc.,</i> 504 F.3d 1249 (Fed. Cir. 2007)10
Other Authorities
37 C.F.R. § 42.100(b)

TABLE OF EXHIBITS

Exhibit	Description
2001	Webster's II New College Dictionary 377 (1999)
2002	U.S. Patent No. 6,081,059
2003	H.R. Rep. No. 112-98 (2011)
2004	Petition for <i>Inter Partes</i> Review, IPR2017-01497, Paper 1 (PTAB June 9, 2017)
2005	Declaration of Patrick Driscoll in Support of Pro Hac Vice Admission

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