
UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BARCO, INC.,
Petitioner

v.

T-REX PROPERTY AB,
Patent Owner

U.S. Patent No. RE39,470
Issue Date: January 16, 2007
Title: DIGITAL INFORMATION SYSTEM

Inter Partes Review Case No. 2017-01909

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

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§§ 42.104(B)(1), (2), (4), AND (5)11

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EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Zaydoon Jawadi submitted with Patent Owner's Preliminary response in <i>Broadsign International, LLC v. T-Rex Property AB</i> , Case No. IPR2016-01869
2002	Curriculum Vitae of Zaydoon Jawadi
2003	Excerpts from Microsoft Computer Dictionary Fourth Edition (1999)
2004	Declaration of Zaydoon Jawadi submitted with Plaintiff's Opening Claim Construction Brief, filed in <i>T-Rex Property AB v. Regal Entertainment Group, et al.</i> , Case No. 6:16-cv-00927-RWS, Dkt. No. 87 (E.D. Tex.)

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<i>Fresenius USA, Inc. v. Baxter Int’l, Inc.</i> , 582 F.3d 1288 (Fed. Cir. 2009)	25
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I. INTRODUCTION

The Board should deny the request for *inter partes* review of U.S. Patent No. RE39,470 because the Petition is based on prior art that fails to disclose each claim element, alone or in combination.

For these reasons, as expressed more fully below, the Petitioner has failed to demonstrate that there is a reasonable likelihood of prevailing with respect to at least one of the challenged claims. Accordingly, the Board should deny the Petition.

II. TECHNOLOGY BACKGROUND

At the time of the invention, there were significant problems with digital control systems for digital signage. A primary concern of the patent is the problem of how to provide a flexible system in which external information mediators are able to dynamically control the transmission of display instructions to a larger public in different places situated at any chosen distance apart through displays. Ex. 1001 at 2:40-45. For instance, the patent describes that, at the time of the invention, “information media is not coordinated, but is in the form of individual items which are controlled and updated separately, often manually.” Ex. 1001 at 1:34-36. The patent further explains that “[a]lthough the administration of information is often processed manually with the aid of modern computer technology, the available display time will nevertheless contain ‘dead time,’

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