

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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RUIZ FOOD PRODUCTS, INC.,

Petitioner

v.

MACROPOINT LLC,

Patent Owner

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U.S. Patent No. 9,429,659

Case No.: IPR2017-02018

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**MACROPOINT, LLC'S PATENT OWNER'S RESPONSE  
PURSUANT TO 37 C.F.R. § 42.120**

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1.	Enzmann fails to disclose a machine for “monitoring location of at least one of a vehicle or freight” or a server programmed to “receive a request for information regarding the location of a vehicle or freight” and “estimate the location of the vehicle or the freight” (claims 1, 2, 12 and 23).....	20
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LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
2001	Expert Declaration of David Hilliard Williams
2002	David Hilliard Williams CV
2003	“What are the differences in the technical specifications in the 1988 automatic onboard recording device (AOBRD) Rule (49 CFR 395.15) and the Electronic Logging Device (ELD) rule?”, <a href="https://www.fmcsa.dot.gov/faq/what-are-differences-specs-1988-aobrd-rule-and-eld-rule">https://www.fmcsa.dot.gov/faq/what-are-differences-specs-1988-aobrd-rule-and-eld-rule</a>
2004	“ELD MANDATE: UPDATES, VIOLATION INFORMATION AND DEVICE INTRODUCTION PRICING & REVIEWS DRIVERS NEED TO KNOW,” <a href="https://unitedworldtransportation.com/eld-mandate-updates-violation-information-device-introduction-pricing-reviews-drivers-need-know/">https://unitedworldtransportation.com/eld-mandate-updates-violation-information-device-introduction-pricing-reviews-drivers-need-know/</a>
2005	“Automatic On-Board Recording Devices (AOBRDs) Hand-Held, Commercial Vehicle Safety Alliance, June 6, 2012, <a href="http://www.ct.gov/dmv/lib/dmv/cv_bulletins/2012-05-automatic-on-board-recording-devices-aobrds-hand-held-created-06-06-12.pdf">http://www.ct.gov/dmv/lib/dmv/cv_bulletins/2012-05-automatic-on-board-recording-devices-aobrds-hand-held-created-06-06-12.pdf</a>
2006	“Small Hardware Device Provides GPS Fleet Tracking Capabilities,” Fleet Financials, October 14, 2010, <a href="https://www.fleetfinancials.com/72619/small-hardware-device-provides-gps-fleet-tracking-capabilities">https://www.fleetfinancials.com/72619/small-hardware-device-provides-gps-fleet-tracking-capabilities</a>
2007	“A Look at the Geotab GO Device: Past, Present, and Future,” Malene Johansen & Vincent Zhu, June 22, 2015, <a href="https://www.geotab.com/blog/geotab-go-device-past-present-future/">https://www.geotab.com/blog/geotab-go-device-past-present-future/</a>
2008	“Announcing Geotab GO5 Premium Vehicle Tracking Device,” April 5, 2011, <a href="https://www.geotab.com/press-release/u-blox/">https://www.geotab.com/press-release/u-blox/</a>
2009	“FMCSA Implementation of MAP-21,” Federal Motor Carrier Safety Administration, September 28, 2012,

<u>Exhibit No.</u>	<u>Description</u>
	<a href="https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/FMCSA%20Implementation%20of%20MAP-21-%20Overview-Agenda-Qs%209-28-12.pdf">https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/FMCSA%20Implementation%20of%20MAP-21-%20Overview-Agenda-Qs%209-28-12.pdf</a>
2010	“The Future of Electronic On-board Recording Devices in the U.S.,” Michael Goldberg, July 3, 2011, <a href="https://www.frg-law.com/blog/the-future-of-electronic-on-board-recording-devices-in-the-u-s/">https://www.frg-law.com/blog/the-future-of-electronic-on-board-recording-devices-in-the-u-s/</a>

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