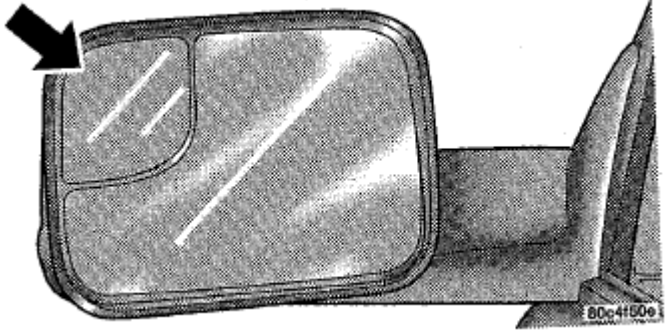
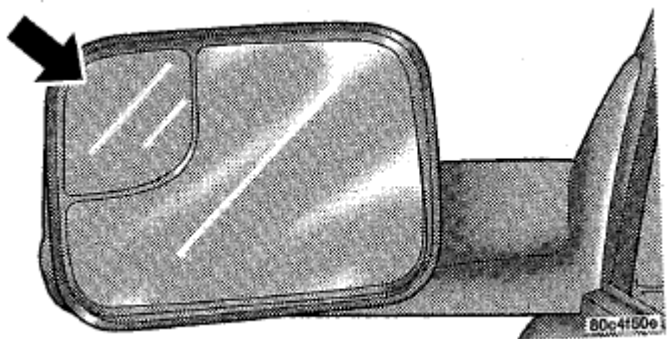
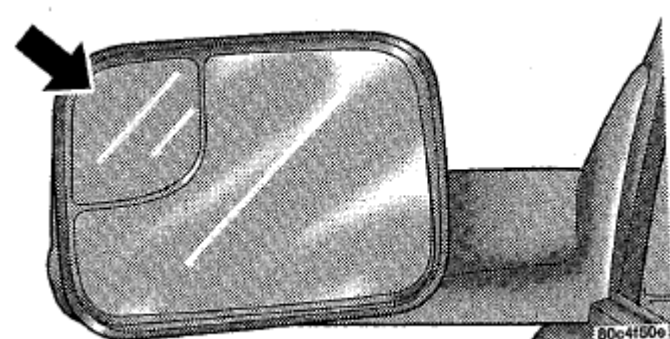


**EXHIBIT B - INVALIDITY CLAIM CHART FOR ALL ASSERTED CLAIMS BASED ON MAGNA 2 TRAILER TOWING MIRROR ALONE OR IN VIEW OF ONE OR MORE OF THE NOTED SECOND**

**A. U.S. Patent No. 7,934,843**

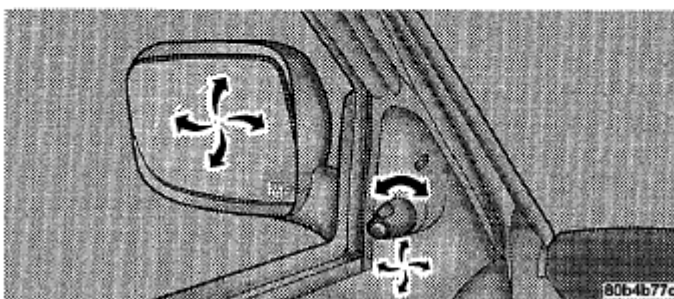
	<b>Claim 15 (depends on claim 1)</b>	2001 Dodge Ram Mirror
<b>a.</b>	<b>1.</b> An exterior sideview mirror system suitable for use on an automobile, said exterior sideview mirror system comprising:	<p>The 2001 Dodge Ram Mirror is an exterior sideview mirror system suitable for  <i>See, e.g.,</i> 2001 Dodge Ram Owner’s Manual (“Ram Manual”) at p. 64</p> 
<b>b.</b>	an exterior sideview mirror assembly adapted for attachment to a side of an automobile;	The 2001 Dodge Ram Mirror is an exterior sideview mirror assembly adapted for attachment to a side of an automobile. <i>See, e.g.,</i> Ram Manual p. 64.

		
<p><b>c.</b></p>	<p>said exterior sideview mirror assembly including a reflective element having a rearward field of view when attached to the side of the automobile;</p>	<p>The 2001 Dodge Ram Mirror includes a reflective element having a rearward field of view when attached to the side of the automobile. <i>See, e.g.</i>, Ram Manual p. 64.</p> 
<p><b>d.</b></p>	<p>said reflective element attached to an electrically-operated actuator of said exterior sideview mirror assembly and movable by said actuator in order to position said rearward field</p>	<p>The 2001 Dodge Ram Mirror includes said reflective element attached to an electrically-operated actuator of said exterior sideview mirror assembly and movable by said actuator in order to position said rearward field of view to a driver-desired position when said exterior sideview mirror assembly is attached to the side of the automobile. <i>See, e.g.</i>, Ram Manual at 63.</p>

of view to a driver-desired position when said exterior sideview mirror assembly is attached to the side of the automobile;

#### **Electronic Power Mirrors — Optional**

The mirror control is mounted on the inside driver's door panel. Rotate the control clockwise to adjust the right-side mirror and counterclockwise to adjust the left-side mirror. The control can be tilted up or down, and left or right, to adjust the view obtained in the outside mirrors.



To the extent the 2001 Dodge Ram Mirror does not disclose said reflective element, the electrically-operated actuator of said exterior sideview mirror assembly and motor in order to position said rearward field of view to a driver-desired position when said mirror assembly is attached to the side of the automobile, a POSITA would have had a view of the Magna 2001 Dodge Ram Trailer Towing Mirror alone or in combination with other references.

*See* discussion of element d in the claim chart for the 2001 Dodge Ram mirror.

*See* discussion of element d in the claim chart for the 2001 GMT800 mirror.

*See* discussion of element d in the claim chart for Platzer 956.

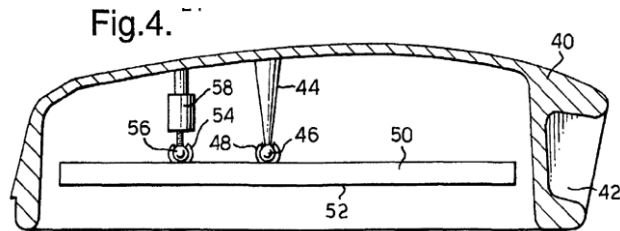
*See* discussion of element d in the claim chart for Platzer 731.

*See* discussion of element d in the claim chart for Henion 013.

*See* discussion of this element in the claim chart for Lynam 026.

*See* EP0864465B1:

“The reflective member 50 has a second integrally moulded socket formation 46 which engages with a spherical formation 56 of a screw jack drive unit 58, which may be as described in EP-A-0272047, and which includes an electric motor 54. The reflective member 50 to be pivoted relative to the housing 40 about an axis through the spherical formation 46 perpendicular to the plane of the drawing. A similar screw jack drive unit (not shown) has its jacking screw engaging with a third spherical socket (not shown) integrally moulded with the reflective member 50 to permit adjustment of the reflective member 50 about the spherical formation 46 orthogonal to the first mentioned axis.” EP0864465B1 at Fig. 4.



EP0864465B1 at Fig. 4.

See 49 C.F.R. § 571.111 (October 1, 1999):

“The mirror shall not be obscured by the unwiped portion of the windshield and shall be adjustable by tilting in both horizontal and vertical directions from the driver's position.” 49 C.F.R. § 571.111 (October 1, 1999) at 318.

See U.S. Pat. No. 6,328,451 at Figs. 1-4; 2:52-3:9.

See U.S. Pat. No. 5,721,646 at Figs. 13-21 and accompanying text.


See U.S. Pat. No. 6,984,048 at Figs. 1-4, 9 and accompanying text.

See also U.S. Pat. No. 5,579,133 at Fig. 12 and accompanying text.

See also U.S. Pat. No. 3,826,563 at Fig. 6 and accompanying text; 3:10-14.

The Asserted Patents admit that an electrically actuated actuator is known in the art. See, e.g.:

“Alternately, when actuator 136 comprises an electrically actuated actuator operable incorporating at least one motor, control 137 can comprise a switch operable preferably, is operable under control of the driver seated in cabin 125) or

		<p>comprise a memory controller, as known in the automotive mirror art, the 136 to move the position of plano-multiradius reflective element assembly in an orientation that suits the rearward field of view preference of an individual (see 9,694,750 at 6:28-37)</p> <p>The applicants conceded that this limitation was known in the art and/or obvious in the prosecution of the '750 Patent. <i>See</i> 11/25/2016 Office Action pp. 5, 12, 18.</p>
<p>e.</p>	<p>wherein said reflective element comprises a plano-auxiliary reflective element assembly, said plano-auxiliary reflective element assembly comprising a plano reflective element having unit magnification and a separate auxiliary reflective element having a curvature;</p>	<p>The 2001 Dodge Ram Mirror comprises a plano-auxiliary reflective element assembly comprising a plano reflective element having unit magnification and a separate auxiliary reflective element having a curvature.</p>  <p><i>See also</i> Ram Manual p. 64:</p>

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