

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re *Inter Partes* Review of:)
U.S. Patent No. 8,155,342)
Issued: April 10, 2012)
Application No.: 11/475,847)
Filing Date: June 27, 2006)

For: **Multimedia Device Integration System**

FILED VIA E2E

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,155,342**

TABLE OF CONTENTS

I.	Introduction.....	1
II.	Mandatory Notices under 37 C.F.R. § 42.8.....	2
	A. Real Parties-in-Interest.....	2
	B. Related Matters.....	2
	C. Grounds for Standing	4
	D. Lead and Backup Counsel and Service Information.....	4
	E. Fee for <i>Inter Partes</i> Review	5
III.	Identification of Challenges (37 C.F.R. § 42.104(B)).....	5
IV.	Background.....	5
	A. The '342 Patent (Ex. 1001)	5
	B. The Prosecution History (Ex. 1002).....	8
	C. The Challenged Claims Are Entitled To An Effective Filing Date No Earlier Than March 3, 2005	9
	D. The Person Of Ordinary Skill In The Art.....	12
	E. Claim Construction	12
	1. “integration subsystem”	13
	2. “car audio/video system”	13
	3. “device presence signal”	14
V.	The Asserted Prior Art.....	14
	A. Simonds (Ex. 1005).....	14
	B. Ekstrom (Ex. 1006)	17
	C. MOST Specification (Ex. 1007)	20

VI.	Ground 1: Claims 49-57, 62-64, 66, 68, 70, 71, 73-80, 83, 86-88, 94, 95, 97, 99-103, 106, 109-111, 113, 115, 120 Are Unpatentable Under 35 U.S.C. § 103 Over Simonds (Ex. 1005), Ekstrom (Ex. 1006) And The MOST Specification (Ex. 1007).....	22
A.	Overview of the Challenged Claims	22
B.	Overview of the Combination	23
C.	Motivation to Combine	25
D.	Independent claims 49 and 73	27
1.	49/73[a]: Preambles	28
2.	49/73[b]: Integration subsystem	28
3.	49/73[c]: Wireless interface in communication with a portable device	35
4.	49/73[d(i)]: Obtaining information about an audio file [stored on/received by] the portable device.....	38
5.	49/73[d(ii)]: Transmit information for display by audio/video system.....	41
6.	49/73[d(iii)]: Instruct portable device to play audio file	42
7.	49/73[d(iv)]: Receive audio generated by portable device via wireless link	44
E.	Independent claim 97	46
1.	97[a]: Preamble	46
2.	97[b]: First and second wireless interfaces establish link between audio/video system and a portable device	46
3.	97[c]: Integration subsystem.....	46
4.	97[d]: Channel audio generated by portable device to the audio/video system via the wireless link	47
5.	97[e(i)]: Integration subsystem receives user's command	47

6.	97[e(ii)]: Process command into format for portable device	49
7.	97[e(iii)]: Send command to portable device	49
F.	Independent Claim 120	50
1.	120[a]: Preamble	51
2.	120[b]: First and second wireless interfaces establish link between audio/video system and portable device.....	51
3.	120[c]: Integration subsystem.....	51
4.	120[d]: Instruct portable device to play audio file.....	51
5.	120[e]: Channel audio generated by portable device to the audio/video system via the wireless link	52
6.	120[f(i)]: Receive data from portable device.....	52
7.	120[f(ii)]: Process data into format for audio/video system.....	53
8.	120[f(iii)]: Transmit data to audio/video system for display	54
G.	Integration Subsystem Dependent Claims	54
1.	Claims 53, 77: Receive, process, and send user's command to portable device	54
2.	Claims 54, 70, 78: Receive data from portable device, process and send to audio/video system for display	54
3.	Claims 66 and 94: Obtain information and play video file	55
4.	Claim 113: Channel video generated by portable device	55
H.	Device Presence Signal Dependent Claims (56, 83, 106).....	55
I.	After-Market Device Dependent Claims	57
1.	Claims 62, 86, 109: Portable digital media player.....	57

2.	Claims 63, 87, 110: Portable digital media player comprises . . . an MP3 player.....	57
3.	Claims 64, 88, 111: Cellular telephone.....	58
J.	File Type Dependent Claims.....	58
1.	Claims 71, 95: Audio file is a song.....	58
2.	Claims 68, 115: Video file includes a picture.....	58
K.	Voice Recognition Dependent Claims	58
1.	Claims 55, 79, 102: Integration system includes a voice recognition subsystem.....	59
2.	Claims 57, 80, 103: Play desired file in response to spoken command.....	59
L.	Location Dependent Claims	60
1.	Claims 50, 74, 99: Integration subsystem within audio/video system.....	60
2.	Claims 100, 101: Audio file is [stored on / received by] the portable device	60
3.	Claims 51, 75: First wireless interface positioned within audio/video system.....	60
4.	Claims 52, 76: Second wireless interface positioned within portable device.....	61
VII.	Secondary Considerations	61
VIII.	Institution Is Appropriate Under §§ 314(a) And 325(d)	61
A.	Background	62
B.	Legal Principles	64
C.	The <i>General Plastic Factors</i> Permit Institution	65
IX.	Conclusion	68

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.