UNITED STATES PATENT AND TRADEMARK OFFICE ————— BEFORE THE PATENT TRIAL AND APPEAL BOARD ————— NICHIA CORPORATION, Petitioner, v. DOCUMENT SECURITY SYSTEMS, INC., Patent Owner. ———— Case IPR2018-00966 Patent 7,652,297

PATENT OWNER'S RESPONSE



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III.	THE CHALLENGED CLAIMS ARE NOT UNPATENTABLE			
	A.		1 Fails Because Loh '842 Fails to Disclose Each Element 1-6	
	1.	Clair	m 1	11
	2.	Clair	m 2	14
	3.	Clair	ms 3-4	15
		a)	Construction of "lower portion" and "upper portion" (c 3 and 4)	
		b)	Loh '842 fails to disclose the "at least one notch" locat set forth in claims 3 and 4	
	4.	Clair	m 5	20
	5.	Clair	m 6	21
		a)	The construction of "at the intersection" (claims 6, 9, a 15)	
		b)	Loh '842 fails to disclose or suggest a notch "at the intersection" recited in claim 6	23
	B.		2 Fails Because Loh '842 Fails to Disclose or Suggest E t of Claims 1-6 and 9	



1.	Claims 1-6
2.	Claim 5
3.	Claim 6
4.	Claim 931
C.	Ground 3 Fails Because Loh '842 in View of Fujiwara Fails to Disclose or Suggest Each Element of Claims 7, 8, and 10-1734
1.	Claims 7-8
2.	Claim 1036
3.	Claims 11-1437
4.	Claims 15-1737
D.	Ground 4 Fails Because Loh '842 and Uraya Cannot be Combined in a Manner that Discloses or Suggests Each Element of Claims 7, 8, and 10-17
1.	Claims 7-8
2.	Claims 10-1739
E.	Ground 5 Fails Because Loh '819 Fails to Disclose Each Element of Claims 1-6
1.	Claim 140
2.	Claim 244
3.	Claims 3-4
4.	Claim 647
F.	Ground 6 Fails Because Loh '819 Fails to Disclose or Suggest Each Element of Claims 1-6 and 9
1.	Claims 1-6
2	Claims 3-450



	3.	Claim 5
	4.	Claim 6
	5.	Claim 954
	G.	Ground 7 Fails Because Loh '819 and Fujiwara Cannot be Combined in a Manner that Discloses or Suggests Each Element of Claims 7, 8, and 10-17
	1.	Claims 7-857
	2.	Claims 10-1760
	Н.	Ground 8 Fails Because Loh '819 and Uraya Cannot be Combined in a Manner that Discloses or Suggests Each Element of Claims 7, 8, and 10-17
	1.	Claims 7-860
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