UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JAGUAR LAND ROVER LTD. AND JAGUAR LAND ROVER NORTH AMERICA, LLC,

Petitioners,

V.

BLITZSAFE TEXAS, LLC,

Patent Owner.

Patent No. 7,489,786
Issue Date: December 11, 2002
Title: AUDIO DEVICE INTEGRATION SYSTEM

PATENT OWNER'S PRELIMINARY RESPONSE

Case No. IPR2018-01203



TABLE OF CONTENTS

I.		BACKGROUND	1
	A.	Prior Unsuccessful Challenges	1
	B.	Asserted Prior Art	2
	C.	Effective Filing Date	3
	D.	Level of Ordinary Skill in the Art	3
	E.	Claim Construction.	4
II.		THE CHALLENGED CLAIMS ARE NOT OBVIOUS IN VIEW OF THE CITED REFERENCES	7
	A.	The Obviousness Standard	8
	B.	The Cited References Do Not Teach or Disclose an Aftermarket Audio or Video Device or Portable Device External to the Car Stereo	9
	C.	The Cited References Do Not Teach or Disclose a "Third Connector Electrically Connectable to One or More Auxiliary Input Source External to the Car Stereo and the After-Market Audio Device" As Required By Independent Claim 1	14
	D.	The Cited References Do Not Teach or Disclose an Interface That Includes a Microcontroller That Is Separate from the Car Stereo and Aftermarket or Portable Devices as Required by Each of the Independent Claims	15
	E.	The Cited References Do Not Teach or Disclose a Code Portion for Remotely Controlling a Portable/Aftermarket Audio Device by Processing a Command in a Format Incompatible with the Device Into a Compatible Format As Required By Independent Claims 1, 57, and 92	18
	F.	The Cited References Do Not Teach or Disclose a Code Portion for Receiving Data from a Portable/Aftermarket Audio Device in a Format Incompatible with a Car Stereo and Processing it Into a Compatible Format As Required By Independent Claim 1	23
	G.	The Cited References Do Not Teach or Disclose a "Device Presence Signal" As Required By Independent Claims 57, 86, and 92	26



IPR2018-01203 Patent No. 7,489,786

Η.	The cited references be twee reach of bisologic the friends flag	20
III.	Function Limitations of Independent Claim 92 THE GENERAL PLASTIC FACTORS FAVOR DENIAL OF	29
	INSTITUTION	32
IV	CONCLUSION	36



TABLE OF AUTHORITIES

Cases	
C.B. Distributors, Inc. v. Fontem Holdings 1 B.V., IPR2013-00387, Paper 43 (PTAB Dec. 24, 2014)	9
General Plastic Industrial Co. v. Canon Kabushiki Kaisha, IPR2016-01357, Paper 19 (PTAB Sept. 6, 2017) (precedential)	32, 34
<i>Graham v. John Deere Co.</i> , 383 U.S. 1 (1966)	8
<i>In re Hedges</i> , 783 F.2d 1038 (Fed. Cir. 1986)	9
Intelligent Bio-Systems, Inc. v. Illumina Cambridge Ltd., IPR2013-00324, Paper 19 (PTAB Nov. 21, 2013)	32
Jaguar Land Rover N. Am., LLC v. Blitzsafe Texas, LLC, IPR2018-00544, Paper 8 (PTAB Aug. 10, 2018)	
<i>In re Kahn</i> , 441 F.3d 977 (Fed. Cir. 2006)	8
Netapp, Inc. v. Realtime Data LLC, IPR2017-01195, Paper 9 (PTAB Oct. 12, 2017)	3, 13, 33, 34
Statutes	
35 U.S.C. § 314	32
35 U.S.C. § 316	34
Other Authorities	
37 C.F.R. § 42.6	29, 30
37 C.F.R. § 42.100	4



EXHIBIT LIST

Exhibit Description

Transcript of August 10, 2018 PTAB Conference Call



DOCKET A L A R M

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.

