

Strawn Declaration in Support of
Petition for *Inter Partes* Review of USP 7,489,786

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re *Inter Partes* Review of:)
U.S. Patent No. 7,489,786)
Issued: February 10, 2009)
Application No.: 10/316,961)
Filing Date: December 11, 2002)

For: **Audio Device Integration System**

FILED VIA E2E

**DECLARATION OF DR. JOHN M. STRAWN IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 7,489,786**

Jaguar Land Rover

Filed: 1/13/10

TABLE OF CONTENTS

Table of Contents i

I. INTRODUCTION..... 8

II. QUALIFICATIONS 8

III. SUMMARY OF MATERIALS REVIEWED AND CONSIDERED..... 12

IV. SUMMARY OF MY OPINIONS..... 15

V. UNDERSTANDING OF LEGAL PRINCIPLES RELEVANT TO
OBVIOUSNESS 15

VI. LEVEL OF SKILL IN THE ART AND PERSPECTIVE APPLIED
IN THIS DECLARATION 18

VII. THE '786 PATENT 19

 A. Overview..... 19

 B. Prosecution History Of The '786 Patent..... 22

VIII. CLAIM CONSTRUCTION 22

 A. “integration” / “integrating (all claims) 22

 B. “car stereo” (all claims) 23

 C. “interface” (all claims)..... 24

 D. “formatted [control] command compatible with” / “formatted
data compatible with” (claims 1, 57, 92)..... 24

 E. “channeling audio signals” (independent claim 1) 33

 F. “portable” (independent claims 57 and 92) 34

 G. “device presence signal” (independent claims 57, 86, 92)..... 34

 H. “maintain ... in an operational state” (independent claims 57,
86, 92) 34

 I. “first pre-programmed means for generating a device presence
signal” (independent claim 92)..... 35

 J. “first pre-programmed means for . . . transmitting the signal to
the car stereo to maintain the car stereo in an operational
state” (independent claim 92) 36

Strawn Declaration in Support of
Petition for *Inter Partes* Review of USP 7,489,786

K.	“means for remotely controlling the portable audio device using the car stereo by receiving a control command from the car stereo in a format incompatible with the portable audio device” (independent claim 92).....	36
L.	“means for remotely controlling the portable audio device using the car stereo by ... processing the control command into a formatted control command compatible with the portable audio device” (independent claim 92).....	37
M.	“means for remotely controlling the portable audio device using the car stereo by ... transmitting the formatted control command to the portable audio device for execution thereby” (independent claim 92)	38
N.	“means for transmitting audio from the portable audio device to the car stereo” (independent claim 92).....	39
IX.	THE PRIOR ART AND OTHER BACKGROUND.....	40
A.	Prior Art Relied Upon For Obviousness Combinations	40
1.	Mufid (Ex. 1005).....	40
2.	MOST Specification (Ex. 1006).....	43
B.	Other Background.....	48
X.	THE CHALLENGED CLAIMS OF THE '786 PATENT ARE OBVIOUS	51
A.	Overview of Challenged Claims.....	51
B.	Overview of the Combination	56
1.	The MOST Specification describes remotely controlling the after-market device by processing the received command from the car stereo into a format compatible with the after-market device.....	60
2.	The MOST Specification describes receiving data from the after-market device for display by the car stereo by processing the received data from the after-market device into a format compatible with the car stereo.	65
3.	The MOST Specification describes a device presence signal to maintain the car stereo in an operational state.	69
4.	In view of the MOST Specification, a POSA would modify the Mufid system to connect an After-Market Device directly to the Microcontroller 86.....	76

Strawn Declaration in Support of
Petition for *Inter Partes* Review of USP 7,489,786

C.	Motivation to Combine.....	78
1.	Reasons for implementing remote control of the after-market device by processing the command received from the car stereo into a format compatible with the after-market device as described in the MOST Specification.....	80
2.	Reasons for receiving data from the after-market device for display by the car stereo by processing the received data from the after-market device into a format compatible with the car stereo as described by the MOST Specification.....	84
3.	Reasons for implementing the device presence signal as described by the MOST Specification	88
4.	Reasons for modifying the Mufid system to connect the After-Market Device directly to microcontroller 86.....	90
D.	Independent Claim 1	93
1.	1[a] Preamble: “An audio device integration system comprising:”	97
2.	1[b] “a first connector electrically connectable to a car stereo”	104
3.	1[c] “a second connector electrically connectable to an after-market audio device external to the car stereo”.....	108
4.	1[d] “a third connector electrically connectable to one or more auxiliary input sources external to the car stereo and the after-market audio device”	113
5.	1[e] “an interface connected between said first and second electrical connectors”	116
6.	1[ei] “for channeling audio signals to the car stereo from the after-market audio device,”	119
7.	1[eii] “said interface including a microcontroller in electrical communication with said first and second electrical connectors,”	123
8.	1[f] said microcontroller pre-programmed to execute:	131

Strawn Declaration in Support of
Petition for *Inter Partes* Review of USP 7,489,786

9.	1[fi] “a first pre-programmed code portion for remotely controlling the after-market audio device using the car stereo by receiving a control command from the car stereo through said first connector in a format incompatible with the after-market audio device, processing the received control command into a formatted command compatible with the after-market audio device, and transmitting the formatted command to the after-market audio device through said second connector for execution by the after-market audio device;”	131
a.	Remotely controlling	135
b.	Receiving	143
c.	Processing	149
d.	Transmitting	153
10.	1[fii] “a second pre-programmed code portion for receiving data from the after-market audio device through said second connector in a format incompatible with the car stereo, processing the received data into formatted data compatible with the car stereo, and transmitting the formatted data to the car stereo through said first connector for display by the car stereo; and”	159
a.	Receiving	162
b.	Processing	165
c.	Transmitting	168
11.	1[fiii] “a third pre-programmed code portion for switching to one or more auxiliary input sources connected to said third electrical connector.”	170
E.	Independent Claim 57	174
1.	57[a] “An audio device integration system comprising:”	174
2.	57[b] “a first electrical connector connectable to a car stereo;”	174
3.	57[c] “a second electrical connector connectable to a portable MP3 player external to the car stereo”	175
4.	57[d] “an interface connected between said first and second electrical connectors”	178
5.	57[di] “for transmitting audio from a portable MP3 player to a car stereo,”	178

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.