UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ONE WORLD TECHNOLOGIES, INC. D/B/A TECHTRONIC INDUSTRIES POWER EQUIPMENT, Petitioner

v.

THE CHAMBERLAIN GROUP, INC. Patent Owner

> Case No. IPR2017-00126 Patent No. 7,161,319

PATENT OWNER'S RESPONSE

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	В.	Petitioner has Failed to Demonstrate that the Combination of Doppelt with AAPA and Jacobs Renders Obvious the Challenged Claims			
		 The Combination of Doppelt with AAPA and Jacobs Fails to Render Obvious "said wall console having a microcontroller [controller]," as Recited by Independent Claims 1 and 9			
		 The Combination of Doppelt with AAPA and Jacobs Fails to Render Obvious "said microcontroller of said motor drive unit being connected to the microcontroller of the wall console by means of a digital data bus," as Recited by Independent Claims 1 and 9			
		 The Combination of Doppelt with AAPA and Jacobs Fails to Render Obvious "wherein at least one microcontroller controls the travel of said door and said one microcontroller makes calculations of the door's location during its travel," as Recited by Claims 3 and 11			
		4. The Combination of Doppelt with AAPA and Jacobs Fails to Render Obvious "wherein power for the wall console is provided from the drive unit via power conductors of the data bus," as Recited by Claims 7 and 15 32			
		 The Combination of Doppelt with AAPA and Jacobs Fails to Render Obvious "wherein the power conductors convey both data and power," as Recited by Claims 8 and 16			

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LIST OF EXHIBITS

Exhibit No.	Description
CG-2001	Chamberlain's Opening Claim Construction Brief before the United
	States International Trade Commission
CG-2002	Petitioner's Opening Claim Construction Brief before the United
	States International Trade Commission
CG-2003	Chamberlain's Reply Claim Construction Brief before the United
	States International Trade Commission
CG-2004	Petitioner's Reply Claim Construction Brief before the United
	States International Trade Commission
CG-2005	Order of the United States International Trade Commission
	Construing Terms of the Asserted Patents
CG-2006	AIA Blog, Sept. 30, 2014, available at:
	http://www.uspto.gov/blog/aia/entry/message_from_administrative
	_patent_judges
CG-2007	Declaration of Dr. Nathaniel J. Davis IV
CG-2008	Microcontroller, McGraw-Hill Electronics Dictionary (6th ed.
	1997)
CG-2009	Transcript of July 12, 2017 Hearing before the International Trade
	Commission in the Case of Certain Access Control Systems and
	Components Thereof
CG-2010	Transcript of July 13, 2017 Hearing before the International Trade
	Commission in the Case of Certain Access Control Systems and
	Components Thereof

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CG-2011	Transcript of July 26, 2017 Deposition of Mr. Lipoff
CG-2012	U.S. Patent No. 5,969,637 to Doppelt et al.

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