

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JUBILANT DRAXIMAGE INC.,
Petitioner,

v.

BRACCO DIAGNOSTICS INC.,
Patent Owner.

Case IPR2018-01449
U.S. Patent No. 9,299,467

**PATENT OWNER'S DEMONSTRATIVE EXHIBITS
FOR ORAL ARGUMENT**

Jubilant DraxImage Inc.

v.

Bracco Diagnostics Inc.

Case IPR2018-01448 – Patent 9,299,468

Case IPR2018-01449 – Patent 9,299,467

Case IPR2018-01450 – Patent 9,299,468

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Prior Art Grounds

- -01448 IPR: '468 Patent: Claims 1, 2, 4-19, and 24-28
 - (I) Klein, Reilly, and Tate
 - (II) Klein, Reilly, Tate, and the Bracco Manual
 - (III) Klein, Reilly, Tate, and Hirschmann
 - (IV) Klein, Reilly, Tate, Hirschmann and Jackson
- -01449 IPR: '467 Patent: Claims 1-4, 6-16, and 18-22
 - (I) Klein (anticipation)
 - (II) Klein and Tate
 - (III) Klein and the Bracco Manual
- -01450 IPR: '468 Patent: Claims 21-23
 - (I) Klein (anticipation)
 - (II) Klein, Hirschmann, and Jackson

Two Main Disputes Between the Parties

1. Whether Klein discloses the “computer prevents” limitations of the patents?
2. Whether it is obvious to move Klein’s off-board dose calibrator to Klein’s cart?

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