

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Motherson Innovations Co., Ltd.,
Petitioner,

v.

Magna Mirrors of America, Inc.,
Patent Owner.

Case IPR2020-00777
Patent No. 10,261,648

Patent Owner's Sur-Reply

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LIST OF EXHIBITS

Exhibit	Description
2001	Declaration of Michael Nranian
2002	Curriculum Vitae of Michael Nranian
2003	Laboratory Test Procedure for FMVSS 111
2004	ECE 324 Regulation 46
2005	SAE Sign Convention for Vehicle Crash Testing
2006	Low-Order Modeling of Vehicle Roll Dynamics
2007	Vehicle Dynamics-Vehicle's Coordinate System [SAE]
2008	Laboratory Test Procedure for Dynamic Rollover – The Fishhook Maneuver Test Procedure
2009	What is a Seamed Edge and Why is it Important
2010	First Supplemental Declaration of Michael Nranian
2011	WO 2011/044312A1
2012	WO 2010/124064A1
2013	U.S. Design Patent No. D633,423
2014	U.S. Design Patent No. D633,019
2015	49 C.F.R. § 571.111: FMVSS 111

I. Petitioner Fails To Satisfy Its Burden of Proving Unpatentability Of The Challenged Claims

A. Neither Lupo Nor Tsuyama Discloses “An Exterior Mirror Reflective Element Fixedly Attached At Said Mirror Head”

Patent Owner’s construction of this phrase derives from what is shown in Figure 68A as the “present invention.” It also follows from the specification’s discussion of how the “present invention” of Figure 68A improves over the “known construction” of Figure 68B. In view of this disclosure, as expert Nranian testified, Patent Owner’s construction is the plain meaning understanding of the term to one of skill in the art. *See Ex. 2001, ¶¶ 77–85.*

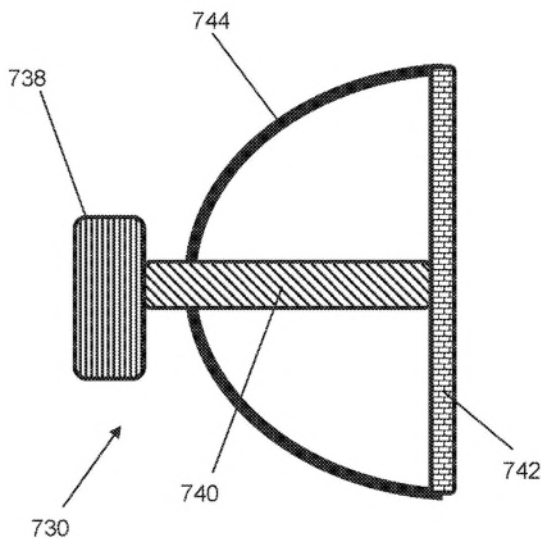


Fig 68A: “present invention”

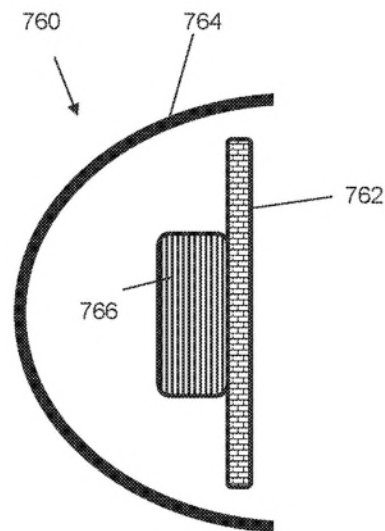


Fig 68B: “known construction”

The Petition offered no construction of this phrase, and the Petitioner’s expert did not opine on its meaning to one of ordinary skill in the art. Petitioner’s Reply again offers no construction, and cites to no testimony of one of skill in the

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