UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CIXI CITY LIYUAN AUTO PARTS CO. LTD., TYGER AUTO, INC., AND HONG KONG CAR START INDUSTRIAL CO. LTD Petitioners,

v.

LAURMARK ENTERPRISES, INC. Patent Owner.

> Case IPR2020-01030 U.S. Patent No. 8,061,758

PATENT OWNER'S PRELIMINARY RESPONSE

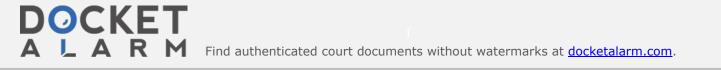


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III. CLAIM	CONSTRUCTION	
inter	at lateral frame member including a first interlocking element rlocked with a back lateral edge of the first spacer bar and first panel pivotally attached to the first spacer bar"	
1.	The claim itself demonstrates that the first interlocking element: (i) is part of the lateral frame member; (ii) is interlocked with the first spacer bar; and (iii) provides a pivotal attachment between the first panel and first spacer bar	
2.	The specification supports Patent Owner's construction6	
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LIK	ONER HAS FAILED TO DEMONSTRATE A REASONABLE ELIHOOD THAT THE CHALLENGED CLAIMS ARE PATENTABLE	
A. Ground 1: Stone in View of Thoman Fails to Render the Challenged Claims Unpatentable		
1.	Stone Does Not Disclose or Render Obvious Claim 2's "the first lateral frame member including a first interlocking element interlocked with a back lateral edge of the first spacer bar and with first panel pivotally attached to the first spacer bar"	
2.	Thoman Does Not Disclose or Render Obvious Claim 2's "the first lateral frame member including a first interlocking	

		element interlocked with a back lateral edge of the first spacer bar and with first panel pivotally attached to the first spacer bar"
	3.	The Combination of Stone and Thoman Does Not Render Obvious Claim 2's "a first interlocking element interlocked with a back lateral edge of the first spacer bar and with first panel pivotally attached to the first spacer bar"
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	2.	Petitioners fail to identify a "lateral frame member" which <i>"includ[es]</i> " "a first interlocking element" in their proposed combination25
	3.	Petitioners' proposed combination does not disclose or render obvious an interlocking element providing pivotal attachment
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	1.	Steffens Does Not Disclose or Render Obvious Claim 2's "the first lateral frame member including a first interlocking element interlocked with a back lateral edge of the first spacer bar and with first panel pivotally attached to the first spacer bar"
	2.	Keller Does Not Disclose or Render Obvious Claim 2's "the first lateral frame member including a first interlocking element interlocked with a back lateral edge of the first spacer bar and with first panel pivotally attached to the first spacer bar"
	3.	Erlandsson Does Not Disclose or Render Obvious Claim 2's "the first lateral frame member including a first interlocking element interlocked with a back lateral edge of the first spacer bar and with first panel pivotally attached to the first spacer bar"

	a. Petitioners provide inadequate motivation to com Erlandsson with Steffens in the manner claimed	
	b. Petitioners' proposed combination does not discle obvious an interlocking element providing pivotal at	
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