

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

STRATOSAUDIO INC.,

Plaintiff,

v.

HYUNDAI MOTOR AMERICA.,

Defendant.

Case No. 6:20-cv-01125-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

MAZDA MOTORS OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01126-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

SUBARU OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01128-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

VOLVO CARS USA, LLC,

Defendant.

Case No. 6:20-cv-01129-ADA

STRATOSAUDIO INC.,

Plaintiff,

v.

VOLKSWAGEN GROUP OF AMERICA, INC.,

Defendant.

Case No. 6:20-cv-01131-ADA

DEFENDANTS' DISCLOSURE OF INVALIDITY CONTENTIONS

StratosAudio Exhibit 2001

Hyundai vs. StratosAudio

TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. GENERAL RESERVATIONS	1
III. U.S. PATENT NO. 8,166,081	5
A. Invalidation Under 35 U.S.C § 102 and § 103	5
1. Prior Art Patents, Patent Applications, and Publications.....	6
2. Prior Art Systems.....	7
3. Obviousness	9
4. Motivation to Combine	14
B. Other Invalidation Grounds	18
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112, ¶1 or ¶6.....	18
2. Indefiniteness Pursuant to 35 U.S.C. 112, ¶2 and/or ¶6	20
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	22
IV. U.S. PATENT NO. 8,688,028	23
A. Invalidation Under 35 U.S.C § 102 and § 103	23
1. Prior Art Patents, Patent Applications, and Publications.....	23
2. Prior Art Systems.....	24
3. Obviousness	26
4. Motivation to Combine	30
B. Other Invalidation Grounds	34
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112 ¶1.....	34
2. Indefiniteness Pursuant to 35 U.S.C. 112 ¶2 and/or ¶6	37
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	39
V. U.S. PATENT NO. 8,903,307	40
A. Invalidation Under 35 U.S.C § 102 and § 103	40
1. Prior Art Patents, Patent Applications, and Publications.....	40
2. Prior Art Systems.....	41
3. Obviousness	43
4. Motivation to Combine	47
B. Other Invalidation Grounds	50

TABLE OF CONTENTS
(continued)

	Page
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112, ¶1.....	51
2. Indefiniteness Pursuant to 35 U.S.C. 112, ¶2 and/or ¶6	54
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	56
VI. U.S. PATENT NO. 9,584,843	57
A. Invalidity Under 35 U.S.C § 102 and § 103	57
1. Prior Art Patents, Patent Applications, and Publications.....	57
2. Prior Art Systems.....	58
3. Obviousness	59
4. Motivation to Combine	63
B. Other Invalidity Grounds	66
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112, ¶¶ 1 and/or 6.....	67
2. Indefiniteness Pursuant to 35 U.S.C. 112, ¶¶ 2 and/or 6	69
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	72
VII. U.S. PATENT NO. 8,200,203	73
A. Invalidity Under 35 U.S.C § 102 and § 103	73
1. Prior Art Patents, Patent Applications, and Publications.....	73
2. Prior Art Systems.....	74
3. Obviousness	75
4. Motivation to Combine	79
B. Other Invalidity Grounds	82
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112, ¶¶1 and/or 6.....	83
2. The Indefiniteness Pursuant to 35 U.S.C. 112, ¶¶2 and/or 6	85
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	87
VIII. U.S. PATENT NO. 9,294,806	88
A. Invalidity Under 35 U.S.C § 102 and § 103	88
1. Prior Art Patents, Patent Applications, and Publications.....	89
2. Prior Art Systems.....	89
3. Obviousness	91
4. Motivation to Combine	94
B. Other Invalidity Grounds	98

TABLE OF CONTENTS
(continued)

	Page
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112, ¶¶1 and/or 6.....	98
2. Indefiniteness Pursuant to 35 U.S.C. 112, ¶¶2 and/or 6	100
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	104
IX. U.S. PATENT NO. 9,366,405	105
A. Invalidity Under 35 U.S.C § 102 and § 103	105
1. Prior Art Patents, Patent Applications, and Publications.....	105
2. Prior Art Systems.....	106
3. Obviousness	107
4. Motivation to Combine	112
B. Other Invalidity Grounds	115
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112, ¶1.....	116
2. Indefiniteness Pursuant to 35 U.S.C. 112, ¶2	117
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	119
X. U.S. PATENT NO. 9,143, 833 (CASE NO. 6:20-CV-1129 ONLY)	120
A. Invalidity Under 35 U.S.C § 102 and § 103	120
1. Prior Art Patents, Patent Applications, and Publications.....	120
2. Obviousness	121
3. Motivation to Combine	121
B. Other Invalidity Grounds	125
1. Enablement and/or Written Description Pursuant to 35 U.S.C. 112 ¶ 1.....	125
2. Indefiniteness Pursuant to 35 U.S.C. 112 ¶2	127
3. Unpatentable Subject Matter Pursuant to 35 U.S.C. 101.....	129

I. INTRODUCTION

Pursuant to the Proposed Joint Scheduling Order (Case No. 6:20-cv-01125-ADA, D.I. 39), Defendants Hyundai Motor America (“Hyundai”), Mazda Motors of America, Inc. (“Mazda”), Subaru of America, Inc. (“Subaru”), Volvo Cars USA, LLC, (“VCUSA”), and Volkswagen Group of America, Inc., (“Volkswagen”) (collectively “Defendants”) hereby serve their initial disclosure of invalidity contentions. Plaintiff StratosAudio Inc. (“StratosAudio”) has asserted the following patents and claims: (1) U.S. Patent No. 8,166,081 (“the ’081 patent”), claims 9-11 and 23; (2) U.S. Patent No. 8,688,028 (“the ’028 patent”), claims 11, 14-16, and 18; (3) U.S. Patent No. 8,903,307 (“the ’307 patent”), claims 11, 15, 16, and 18; (4) U.S. Patent No. 9,584,843 (“the ’843 patent”), claims 10, 11, and 13; (5) U.S. Patent No. 8,200,203 (“the ’203 patent”), claims 43, 47, 48, 51, and 52; (6) U.S. Patent No. 9,294,806 (“the ’806 patent”), claims 5-8 and 10; (7) U.S. Patent No. 9,366,405 (“the ’405 patent), claims 12-16; and (8) U.S. Patent No. 9,143,833 (“the ’833 patent”), claims 1, 3-5-7, and 9 (collectively the “Asserted Claims” of the “Asserted Patents”).¹

II. GENERAL RESERVATIONS

These invalidity contentions are provisional. Defendants reserve the right to revise or supplement these contentions in light of newly-discovered prior art; discovery produced in this case, such as party and third-party discovery (such as device art expected from third parties); StratosAudio’s infringement contentions; any claim construction order issued by the Court; review and analysis by expert witnesses; and further investigation and discovery regarding the defenses asserted by Defendants. Without limiting the foregoing, Defendants expressly reserve the right to amend these contentions after issuance of the claim construction order; should

¹ The ’833 Patent is asserted only against VCUSA and no other defendants, join that section.

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