UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

META PLATFORMS, INC.,
Petitioner

v.

THALES VISIONIX, INC.,
Patent Owner

U.S. PATENT NO. 6,922,632

IPR2022-01305

PATENT OWNER'S PRELIMINARY RESPONSE

December 14, 2022

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1. The Petition does not adequately specify the bases for this Ground, and therefore fails on procedural grounds. 12

a. The Petition does not adequately identify which reference supposedly discloses each limitation of independent claims 30, 33, 44, and 47. 13

b. Petitioner fails to identify the differences between the prior art and independent claims 30, 33, 44, and 47....14

c. Petitioner fails to incorporate its arguments regarding independent claims into arguments regarding dependent claims 31-32, 34-36, 45, 48-49, 51, 53, and 59-61. 18

2. Petitioner has failed to show that Welch 2001 and Welch 1997 render claims 30-32 obvious....18

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a. Petitioner misreads Claim 30 in attempting to map it onto the HiBall system of Welch 2001. 19

b. Petitioner has not shown that dependent claims 31 and 32 are obvious. 20

3. Petitioner has failed to show that Welch 2001 and Welch 1997 render claims 33-36 obvious. 20

a. Petitioner fails to address critical limitations of claim 33. 21

i. Limitation 33[a] 21
ii. Limitation 33[c] 22

b. Petitioner has not shown that dependent claims 34-36 are obvious. 23

i. Claim 34 23
ii. Claim 36 24

4. Petitioner has failed to show that Welch 2001 and Welch 1997 render claims 44-45 obvious. 24

a. Petitioner has not shown that Welch 2001 discloses or renders obvious each limitation of claim 44. 25

b. Petitioner has not shown that dependent claim 45 would have been obvious. 26

5. Petitioner has failed to show that Welch 2001 and Welch 1997 render claims 47-49, 51-53, and 59-61 obvious. 26

a. Petitioner's arguments regarding Claim 47 Are internally inconsistent and incorrect. 26

i. Petitioner is inconsistent with respect to the claimed "sensor modules." 27
ii. Limitation 47[c][1] 29
iii. Limitation 47[d][1] 30
iv. Limitation 47[d][2] 31

b. Petitioner has not shown that dependent claims 48-49, 51-53, and 59-61 are obvious. 32

i. Claim 59 32
ii. Claim 60 35
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B. The Petition Fails to Establish that Welch 2001, Welch 1997, and Welch Thesis Render Claim 50 Obvious (Ground II).....36

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1. The Petition does not adequately specify the bases for this Ground, and therefore fails on procedural grounds. 40

a. Petitioner fails to articulate the differences between Horton and independent claims 30, 33, and 47.....41

b. Petitioner fails to incorporate its arguments regarding independent claims into Arguments regarding dependent claims 31-32, 50-51, 53, and 59-61. 42

2. Petitioner has failed to show that Horton renders claims 30-32 obvious.....43

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ii. *Limitations 30[a] and 30[b]* 44
iii. *Limitation 30[c]* 45
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3. Petitioner has failed to show that Horton renders claim 33 obvious. 47

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4. Petitioner has failed to show that Horton renders claims 47, 50-53, and 59-61 obvious. 49

a. Petitioner's arguments regarding claim 47 are internally inconsistent and incorrect. 49

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