

Paper No. 21
Dated: November 30, 2020

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COOLIT SYSTEMS, INC.,
Petitioner,

v.

ASETEK DANMARK A/S,
Patent Owner.

Case No. IPR2020-00523
U.S. Patent No. 10,078,354

PATENT OWNER'S RESPONSE

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 A. Batchelder in view of Shin does not disclose “the lower chamber includes a plurality of channels configured to ... direct the cooling liquid from the central region toward the perimeter of the lower chamber” as required by claim 116

 1. Batchelder does not disclose flow of cooling liquid from a central region of its alleged “lower chamber” towards the perimeter; rather, Batchelder discloses the opposite flow direction18

 2. Nor does Shin disclose flow of cooling liquid from a central region of its alleged “lower chamber” towards the perimeter25

 3. There is no motivation, or reasonable expectation of success, for modifying the flow direction in Batchelder’s device26

 B. Batchelder in view of Shin does not disclose a “first passage” that “directs the cooling liquid into the lower chamber where the cooling liquid splits and is directed along a plurality of channels from a central region of the lower chamber outward,” as recited in claim 15.....29

C. Batchelder in view of Shin does not disclose a “second passage positioned at a perimeter of the lower chamber” that directs cooling liquid from the “lower chamber,” as recited in claim 1535

D. A person skilled in the art would not have been motivated to modify Batchelder to have a “radiator spaced apart from and fluidly coupled to the reservoir,” as required by each of the independent claims 1, 8, and 1537

VI. Ground 2 of the Petition Does Not Establish Obviousness of Claims 4, 14, or 19 Based on Batchelder, Shin, and Cheon42

A. Batchelder, Shin, and Cheon do not disclose a control system “configured to adjust a rotational speed of a fan and a rotational speed of a pump” as required by claim 1442

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