

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

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