

DAIFUKU CO., LTD. AND DAIFUKU AMERICA CORP.,
Petitioners

v.

MURATA MACHINERY, LTD.,

Patent Owner

Case IPR2015-10538 Patent 6,113,341

PATENT OWNER'S RESPONSE



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		2.	The '809 Publication discloses a lighter system and teac away from crane F of the '777 Patent			
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		1.	The '809 Publication and the '777 Patent do not disclose the "fork elevation section" of Claim 1			



	2.	The '809 Publication teaches away from the '777 Patent30
		a. The inventors of the '809 Publication considered and decided against extending the travel of a prior art stacker crane31
		b. The inventors of the '809 Publication adopted a lighter, smaller ceiling motorized vehicle
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	3.	Petitioners have otherwise failed to carry their burden of proving Claim 1 would have been obvious
		a. Petitioners have not been clear37
		b. The elements of the '777 Patent and the '809 Publication are very different both structurally and functionally
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