

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ONE WORLD TECHNOLOGIES, INC.
D/B/A TECHTRONIC INDUSTRIES POWER EQUIPMENT,
Petitioner

v.

THE CHAMBERLAIN GROUP, INC.
Patent Owner

Case No. IPR2017-00214
Patent No. 7,196,611

PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I. INTRODUCTION.....1

II. STATEMENT OF RELIEF REQUESTED1

III. BACKGROUND2

IV. CLAIM CONSTRUCTION2

 A. “identifying by the controller, the activities to be completed by a user of the barrier movement operator” (claim 18) / “determining ... the user actions to complete the interactive mode” (Claim 21).....3

V. PETITIONER HAS FAILED TO DEMONSTRATE THAT ANY OF THE CHALLENGED CLAIMS OF THE '611 PATENT ARE UNPATENTABLE.....5

 A. Ground 1 is deficient with respect to claim 18 because the Petition has not shown that Schindler anticipates “identifying by the controller, the activities to be completed by a user of the barrier movement operator”5

 B. Ground 1 is deficient with respect to dependent claim 19 because the Petition has not shown that Schindler anticipates “annunciating the next activity to the user”6

 1. Petitioner’s expert testified that Baer Figure 1 is a “translation” of the source code from Schindler7

 2. Petitioner’s expert fails to identify any code from Schindler that was translated into the “loop” in Baer Figure 19

 3. The Petition explicitly relies on these features from Baer Figure 1 that have not been shown to be present in Schindler.....14

 4. The Petition does not show that Schindler anticipates “annunciating the next activity to the user” even if the “loop” in Baer Figure 1 is supported by Schindler17

C. Ground 1 is deficient with respect to claim 21 because the Petition has not shown that Schindler anticipates “determining ... the user actions to complete the interactive mode”18

D. Ground 1 is deficient with respect to claim 21 for at least the same reasons as claims 19.....19

E. Grounds 1 and 2 are deficient with respect to dependent claims 19, 20, and 22-2519

VI. CONCLUSION20

LIST OF EXHIBITS

Exhibit No.	Description
CG-2001	Declaration of Declaration of Dr. Nathaniel J. Davis, IV (“Dec.”)
CG-2002	Deposition Transcript of Stuart Lipoff (“Lipoff Transcript”)
CG-2003	Exhibits to Deposition Transcript of Stuart Lipoff
CG-2004	Deposition Transcript of Nikolaus Baer (“Baer Transcript”)
CG-2005	Curriculum Vitae of Dr. Nathaniel J. Davis, IV

I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.120(a), The Chamberlain Group, Inc. (“Patent Owner”), hereby submits the following Response to the Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 7,196,611 (“the ’611 patent”).

The ’611 patent, entitled “Barrier Movement Operator Human Interface Method and Apparatus,” contains 25 claims, of which claims 1, 17, 18, and 21 are independent. On May 16, 2017, the Board instituted the present IPR as to claims 18-25 of the ’611 patent (the “Challenged Claims”). *See* Decision, p. 26. This proceeding is limited to the following two grounds presented in the Petition:

- **Ground 1:** Anticipation of claims 18-25 over Schindler; and
- **Ground 2:** Obviousness of claims 23-34 over Schindler and LiftMaster.

As described herein, Petitioner fails to show that any claim of the ’611 patent is rendered unpatentable by the Schindler alone or in combination with LiftMaster. In light of this failure by Petitioner, Patent Owner respectfully requests that the Board find Challenged Claims patentable.

II. STATEMENT OF RELIEF REQUESTED

Patent Owner respectfully requests the Board to deny the Petition for the following reasons:

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.