

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DATASPEED INC.,

Petitioner,

v.

SUCXESS LLC,

Patent Owner.

Case IPR2020-00116

Patent 9,871,671

PATENT OWNER'S PRELIMINARY RESPONSE

EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Maxwell Goss in Support of Motion to Appear Pro Hac Vice on behalf of patent owner Suxcess LLC
2002	ISO 11898-1, Road vehicles – Controller area network (CAN) – Part 1: Data link layer and physical signalling, First edition 2003-12-01 ("ISO")
2003	Denton, Tom. Advanced automotive fault diagnosis. Oxford Burlington, MA: Butterworth-Heinemann, 2006 ("Denton")
2004	BAE Systems, Inc., Job posting "Vehicle Systems Architect", retrieved from https://jobs.baesystems.com/global/en/job/56889BR on 02-Jan-2020
2005	Fiat Chrysler Automobiles, Job posting "Electrical Technician", retrieved from https://careers.fcagroup.com/job/10316315/ on 02-Jan-2020

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3.	Munoz does not teach connecting the factory-installed first apparatus to the second data bus.	19

4. Munoz does not teach transmitting a second message being indistinguishable from a first message.....19

B. Dependent Claim 2: Munoz fails to teach that the second message uses the identifier of the first message.....22

C. Dependent Claim 4: Munoz fails to teach wherein the retrofit apparatus re-transmits messages received on the vehicle data bus to the factory-installed first apparatus through the second data bus.24

D. Independent Claim 625

1. Munoz fails to teach a retrofit apparatus connected to the vehicle data bus including a second processor programmed to transmit a second message that mimics the first message through a second data bus.25

E. Independent Claim 1027

1. Munoz fails to teach a retrofit apparatus, operatively connected to the vehicle data bus, including a second processor programmed to send a second message having the same message identifier.....27

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A. Independent Claim 131

1. Dietz fails to teach adding a second data bus to the vehicle.31

2. Dietz fails to teach transmitting a second message from the retrofit apparatus to the factory-installed first apparatus through the second data bus, the second message being indistinguishable from the first message.35

B. Dependent Claim 2: Dietz fails to teach wherein the second message uses the identifier of the first message.36

C. Dependent Claim 4: Dietz fails to teach wherein the retrofit apparatus re-transmits messages received on the vehicle data bus to the factory-installed first apparatus through the second data bus.38

D. Independent Claim 6: Dietz fails to teach a retrofit apparatus connected to the vehicle data bus including a second processor programmed to transmit a second message that mimics the first message through a second data bus.41

E. Dependent Claim 7: Dietz fails to teach the second message with the same message identifier as the first message.42

F. Independent Claim 1043

1. Dietz fails to teach a retrofit apparatus, operatively connected to the vehicle data bus, including a second processor programmed to send a second message having the same message identifier.43

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