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

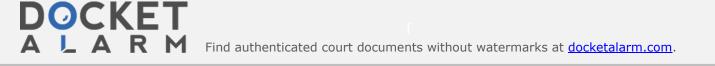


EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Maxwell Goss in Support of Motion to Appear Pro Hac Vice on behalf of patent owner Sucxess 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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A.	Independent Claim 1
1	. Dietz fails to teach adding a second data bus to the vehicle
2	. Dietz fails to teach transmitting a second message from the retrofit
aj	pparatus to the factory-installed first apparatus through the second data bus,
tł	ne second message being indistinguishable from the first message
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