

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 RESPONSE TO
PETITION FOR *INTER PARTES REVIEW***

EXHIBIT LIST

Exhibit No.	Description
2001	Declaration of Maxwell Goss in Support of Motion to Appear Pro Hac Vice on behalf of patent owner Success 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
2006	reserved
2007	Volkswagen Service Training. “Self-study Program 871603. The Eos 2006 Electrical System Design and Function”
2008	“VW Eos Convertible Hardtop Emergency Opening and Closing Using Autologic DrivePRO,” https://us.autologic.com/news/vw-eos-convertible-hardtop-emergency-opening-and-closing .

2009	Resume of Mahdi Shahbakhti , Ph.D.
2010	YouTube Video “VW Eos Convertible Hardtop Emergency Opening and Closing,” https://youtu.be/KhgrBsIDO_0 .
2011	Currie, Roderick. “Developments in Car Hacking.” (2015).
2012	Bernd Elend, Tony Adamson. “Cyber security enhancing CAN transceivers.” (2017)
2013	YouTube Video “EOS ROOF OPENING WHILE DRIVING,” https://youtu.be/Fll2sWA-iwA
2014	Convertible Roof Wiring Diagram, 2007 Volkswagen Eos (1F7) V6-3.2L (BUB)
2015	Convertible Roof Wiring Diagram, 2007 Cadillac XLR V8-4.6L
2016	Convertible Roof Wiring Diagram, 2007 Lexus SC 430
2017	Convertible Roof Wiring Diagram, 2007 Mazda MX-5 Miata
2018	Convertible Roof Wiring Diagram, 2007 Saab 9-3
2019	Convertible Roof Wiring Diagram, 2007 Pontiac G6
2020	Convertible Roof Wiring Diagram, 2007 Mini Cooper S Convertible
2021	Convertible Roof Wiring Diagram, 2007 Audi S4 Quattro Cabriolet

2022	Convertible Roof Wiring Diagram, 2007 Ford Mustang
2023	Convertible Roof Wiring Diagram, 2007 Porsche Boxster (987)
2024	Robert Leale, Deposition Transcript
2025	2007 Pontiac G6 Service Manual
2026	Annotated copy of Munoz Fig. 1
2027	YouTube Video “EOS ROOF MODULE SETUP MENU,” https://youtu.be/yQ9xqvHwe0o
2028	Declaration of Dr. Mahdi Shahbakhti
2029	U.S. Trademark Ser. No. 77-198,481, Reg. No. 3,388,116
2030	YouTube Video “Vario Plus Control Module Ultra features walk-through,” https://youtu.be/9PYK9j3FFx4
2031	Connector pinout of 2007 Audi A4 Cabriolet, Bose Amplifier, 25-Pin and 32-pin.

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- VIII. Ground 1: The Claims are not obvious over Munoz alone or in combination with Negley, SAE, and Bosch.....31
 - A. Independent Claim 140
 - 1. [1.1] Munoz does not teach providing a vehicle having a factory-installed first apparatus including a processor, programmed to communicate with a

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