

PATENT OWNER'S ORAL ARGUMENT

March 6, 2024

ZF et al. v. Stoneridge Control Devices, Inc.

IPR2023-00273

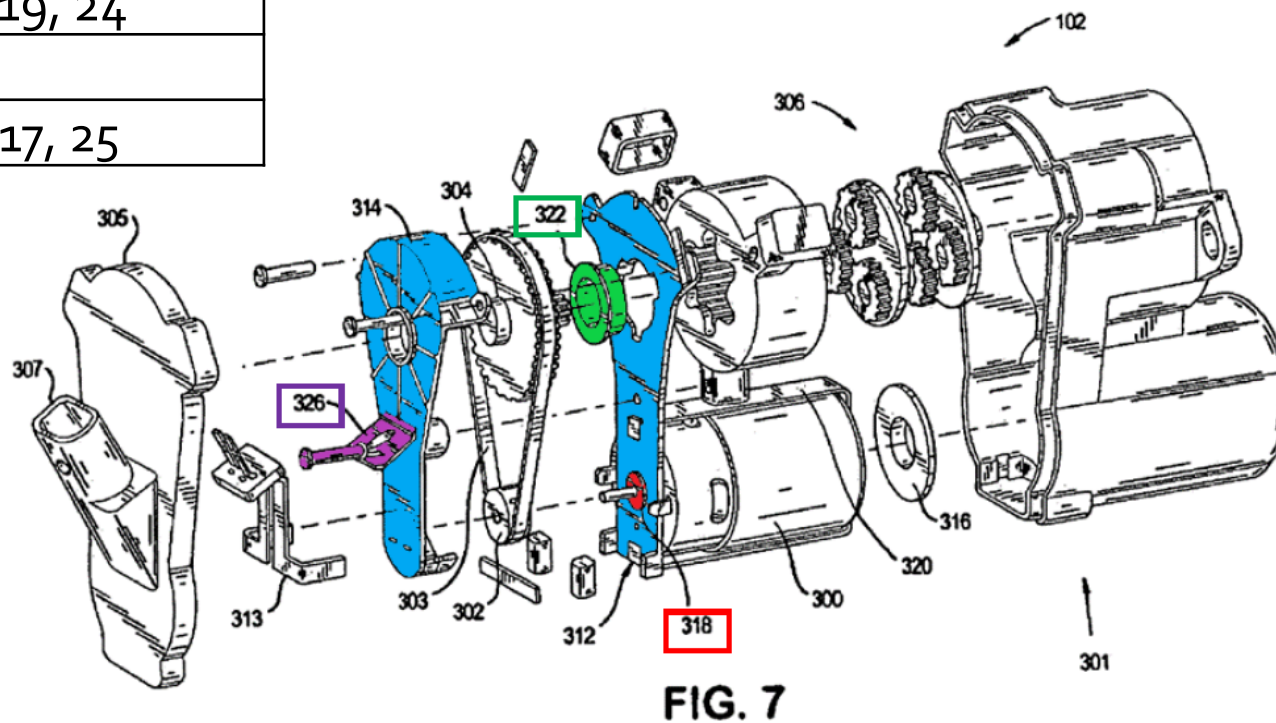
U.S. Patent No. 7,021,415



DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

Prior Art ≠ Specific Isolator Locations

Isolator location	Claim
Sub-frame/motor (red)	5, 14, 19, 24
Sub-frame/gear set (green)	7
Sub-frame/housing (purple)	8, 16, 17, 25



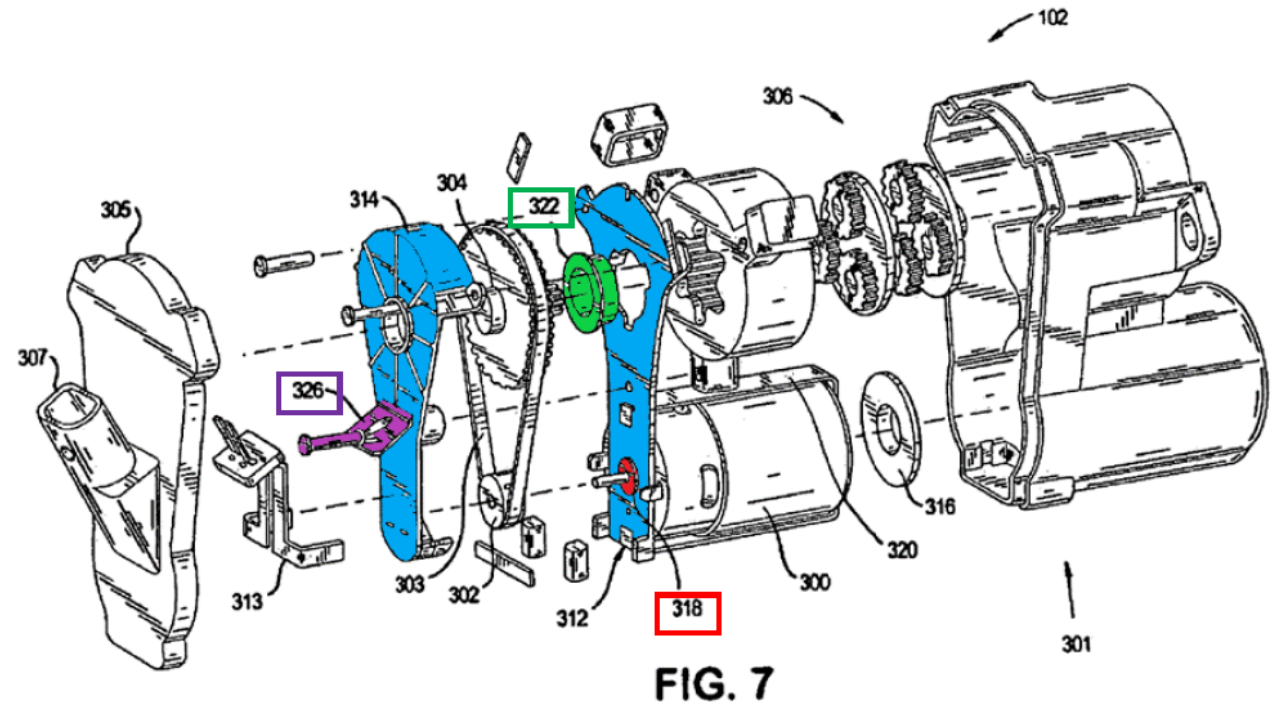
See POR at pages 9-13, 23-38, 40-44; Sur-Reply at pages 7-16; '415 Patent at Figure 7

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

Prior Art ≠ Multiple Distinct Isolators

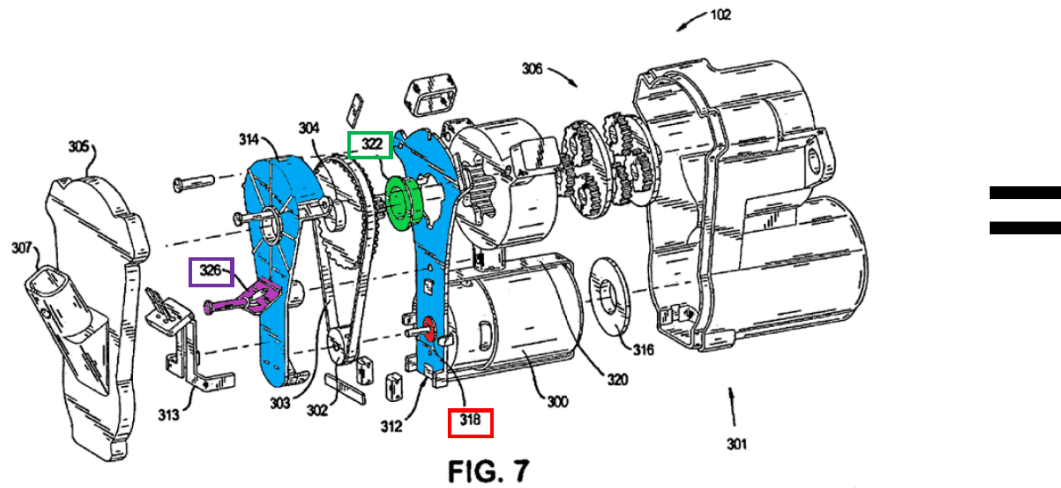
Claim 19 recites red and purple isolators

Claims 15 and 24 also recite multiple distinct isolators



See POR at pages 42, 44-45; Sur-Reply at pages 20-21; '415 Patent at Figure 7 and Claims 15, 19, 24

“Hindsight trap”



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In re Kotzab, 217 F.3d 1365, 1371 (Fed. Cir. 2000).

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

See POR at page 33; Sur-Reply at
pages 12-13; '415 Patent at Figure 7

	POERTZGEN v. BOUCHERET	
Type	Precision positioning device	Fan
Time	Short burst	Extended periods
Speed	Variable	Constant
Vibrations	Complex	Stable
Isolators?	No	Yes

Poertzgen

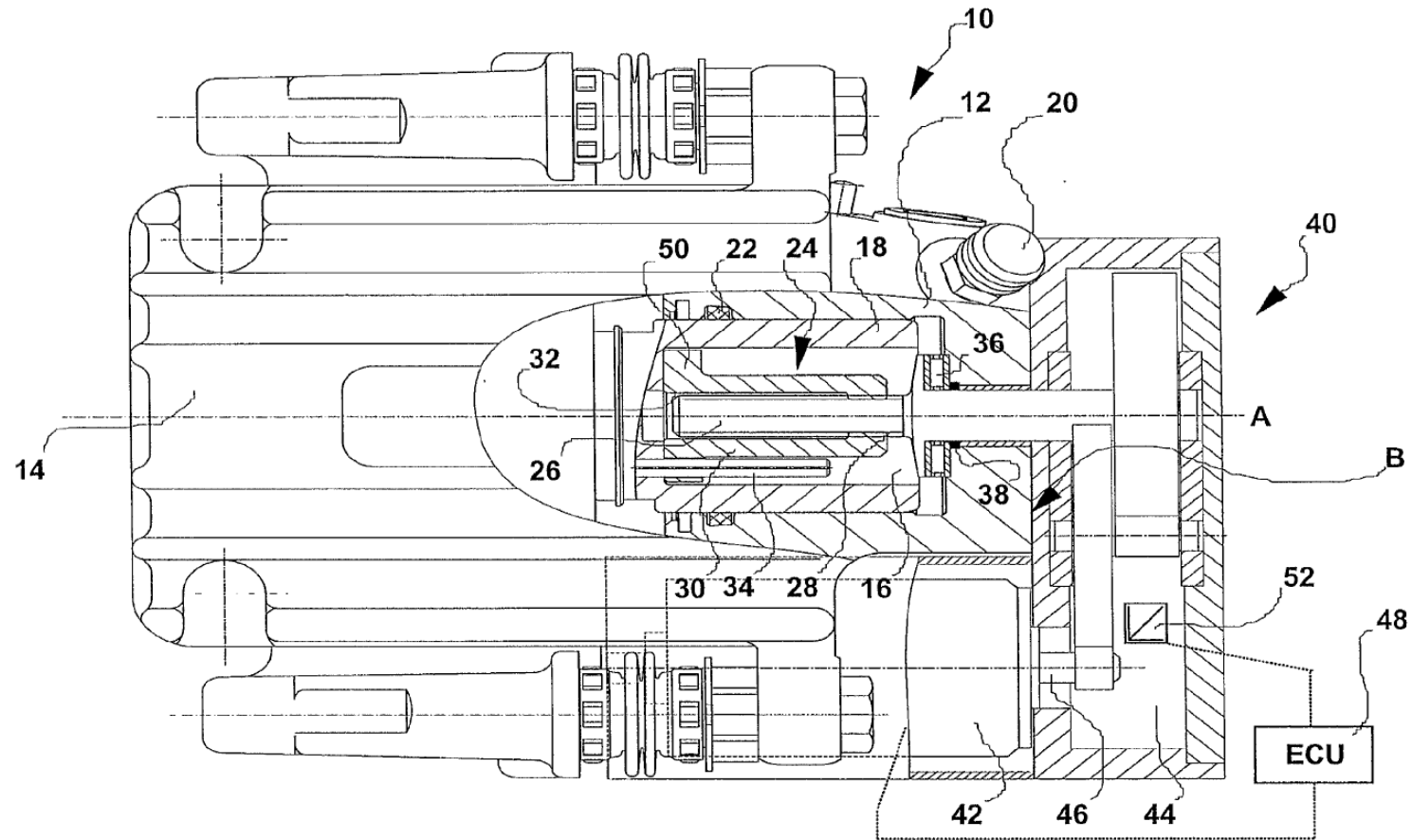


Fig. 1

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

See Poertzgen (Exs. 1007 and 1008) at Fig. 1

Boucheret

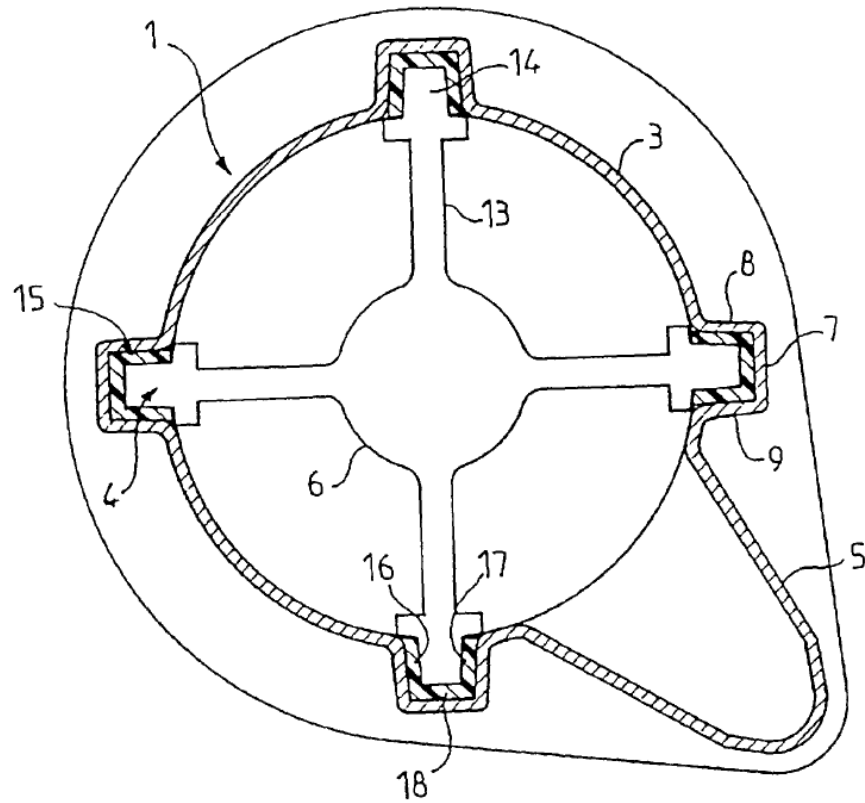


FIG. 3

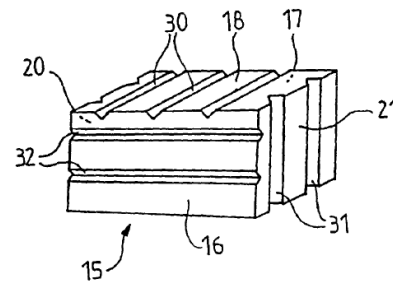


FIG. 4

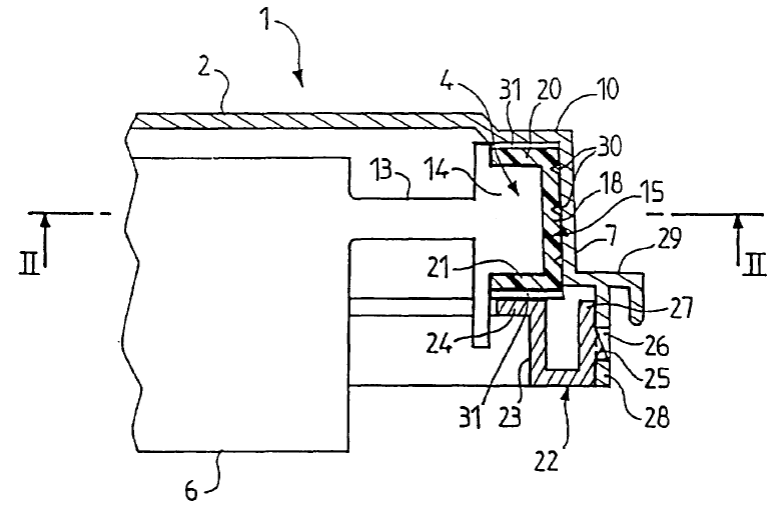


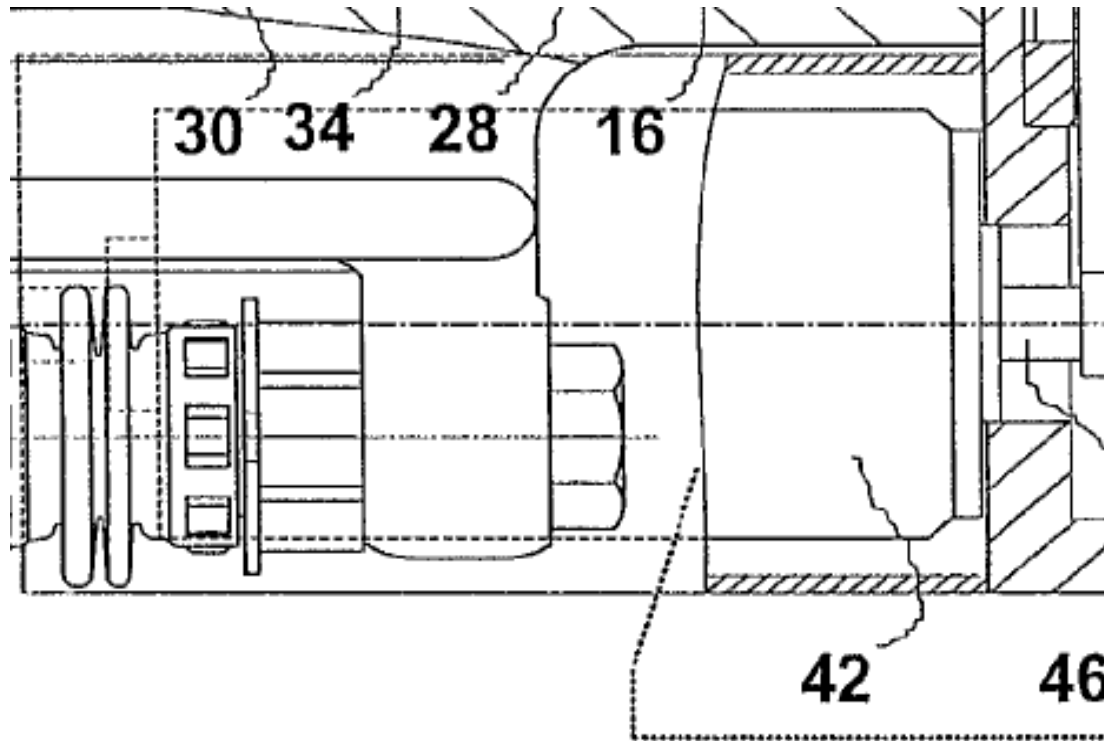
FIG. 2

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

See Boucheret (Ex. 1010) at Figs. 2-4

Poertzgen ≠ Motor Isolation Cavity

Other possibilities:



Poertzgen could be showing a motor mounting strap, similar to this...

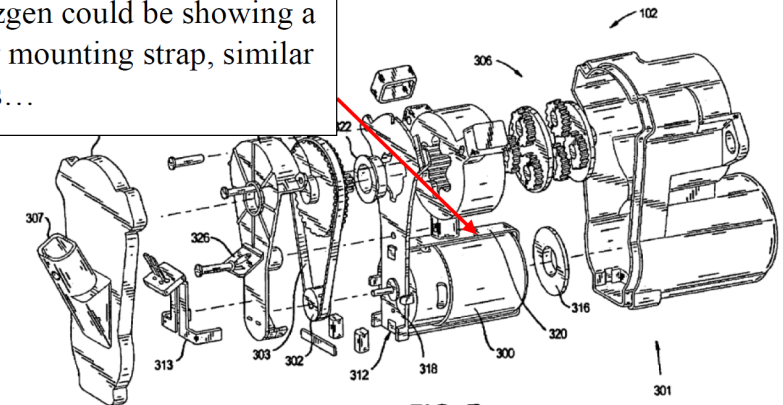
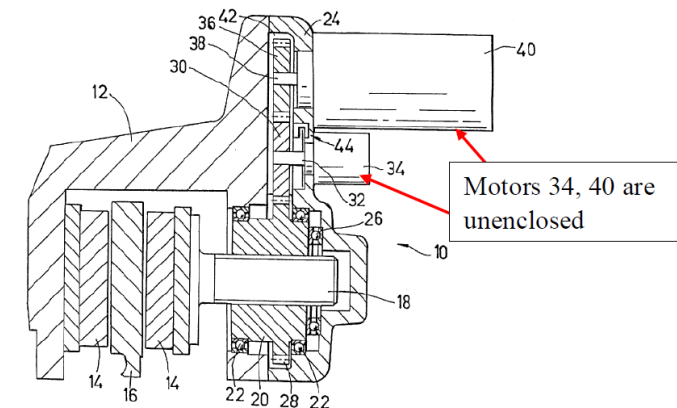


FIG. 7



Motors 34, 40 are unenclosed

See POR at pages 44-48; Sur-Reply at pages 5-7; Petition at pages 50-51; Poertzgen at Figure 1

Sub-Frame $\neq$ Actuator Housing

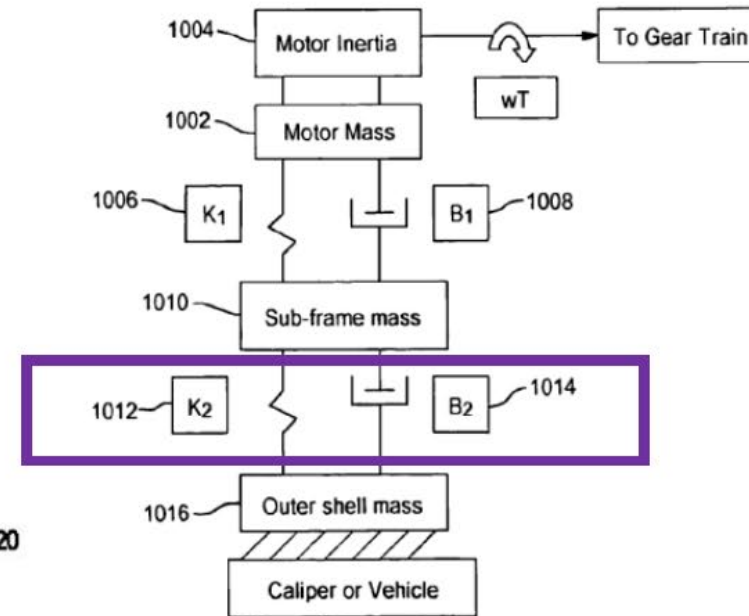
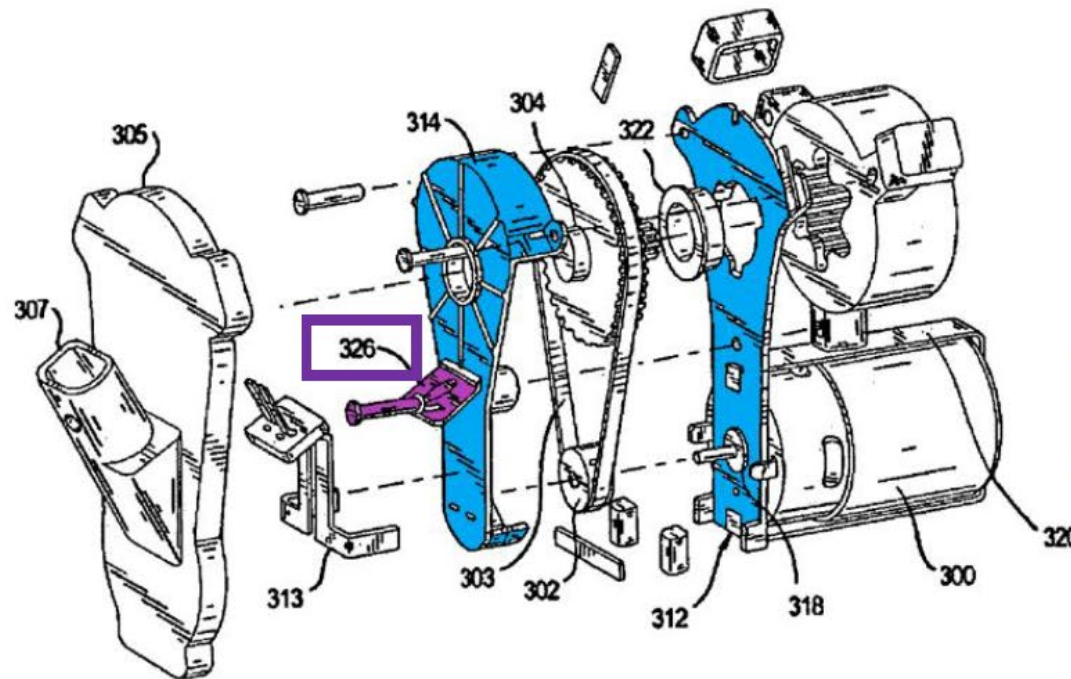
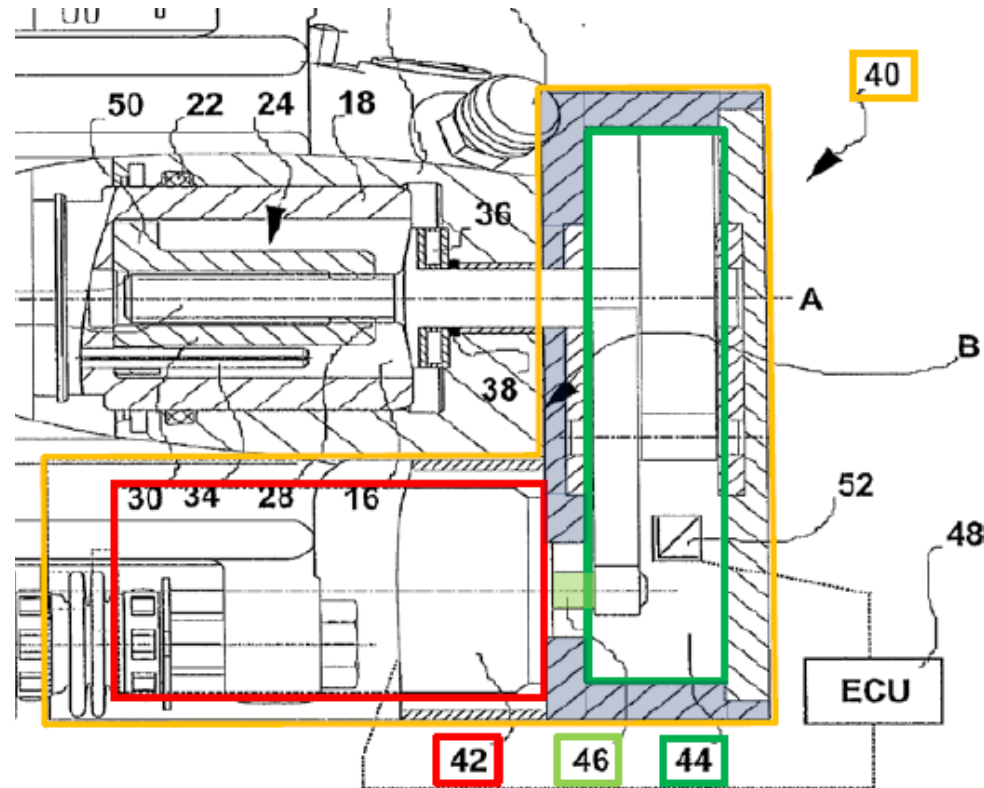


FIG. 10

See POR at pages 13, 16-18; '415
Patent at Figures 7 and 10

Poertzgen

Poertzgen's "sub-frame" (grey) is part of the "actuator housing" (orange)



See Petition at pages 24, 25; POR at pages 38-40; Sur-Reply at pages 2-4; Boucheret at Figure 1

DEMONSTRATIVE EXHIBIT - NOT EVIDENCE

Actuator Housing ≠ Brake Caliper

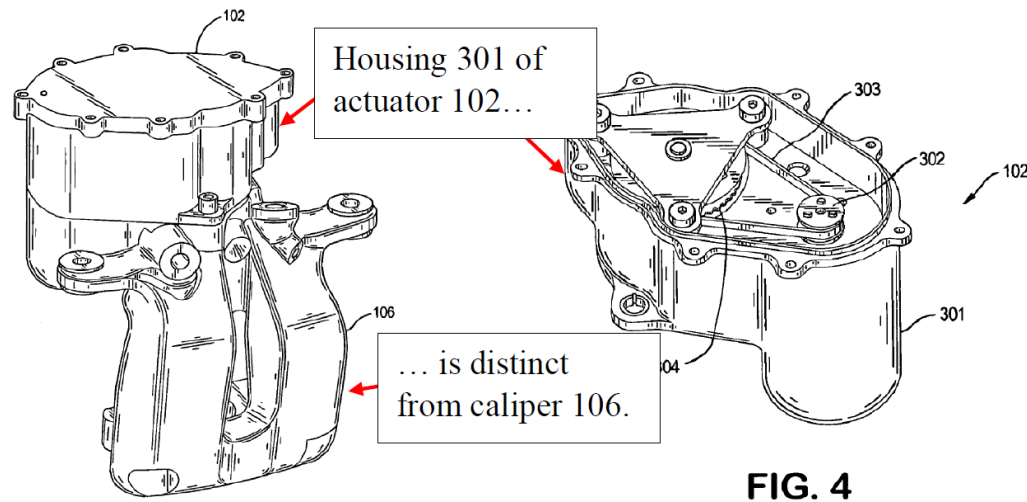


FIG. 4

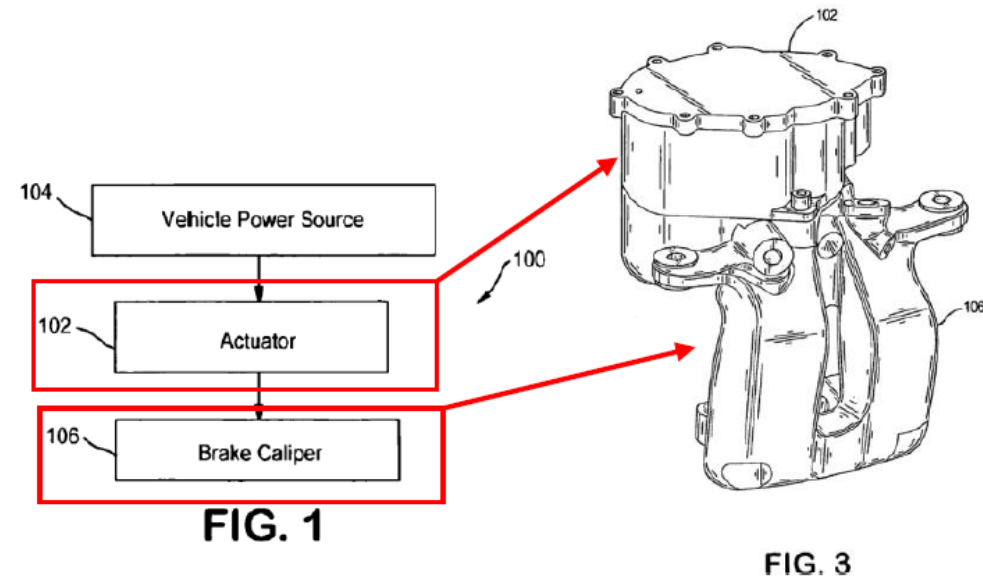
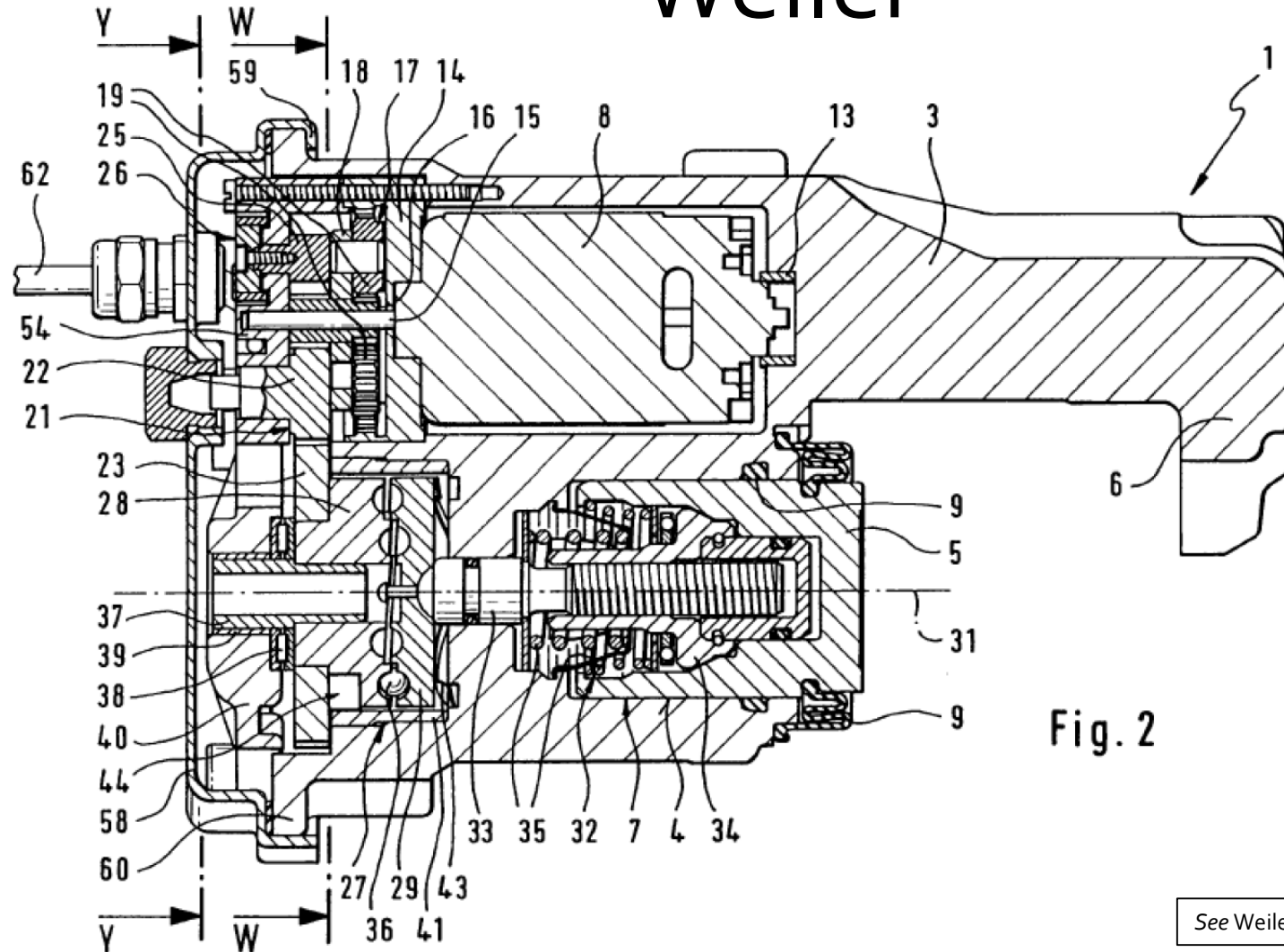


FIG. 1

FIG. 3

Weiler



See Weiler (Ex. 1012) at Fig. 2

Secondary Considerations

TIMELINE

1. ZF design does not include isolators
2. Stoneridge shows ZF that isolators reduce noise in EPBAs
3. Later, ZF adds isolators

(... ZF and sells 200 million units)

CERTIFICATE OF SERVICE

The undersigned certifies that on February 29, 2024, a copy of the foregoing document was served electronically via email in its entirety on the following:

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Petitioners have consented to electronic service.

Respectfully Submitted,

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