

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

iQAR INC.,
Patent Owner

Case IPR2024-00499
U.S. Patent No. 10,829,002

PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	Claim Construction.....	2
A.	iQar’s Implicit Constructions Depart From Plain Meaning Without Sufficient Justification.....	2
1.	Route segment ([1b], [1d-1], [1d-2], [15b], [15d], [16d], [16f])	3
2.	Data, regarding multiple route segments ([1d-1], [15d], [16f])..	4
III.	The Combination Of Kudo-325 and Kudo-066 Renders Claims 1, 15, and 16 Unpatentable	7
A.	iQar’s argument that Kudo-325’s transition state information does not capture a route traveled between two points is divorced from the plain language of the claims	7
B.	Kudo-325’s transition state data render obvious the claimed data regarding multiple route segments even under iQar’s narrow claim interpretation	12
IV.	The Combination of Kudo-325 and Kudo-066 Renders Claims 2 and 3 Unpatentable	16
V.	The Combination of Kudo-325 and Kudo-066 Renders Claim 10 Unpatentable	19
VI.	CONCLUSION.....	22

LIST OF EXHIBITS

TESLA-1001	U.S. Patent No. 10,829,002 (“the ’002 Patent”)
TESLA-1002	Excerpts from the Prosecution History of the ’002 Patent
TESLA-1003	Declaration and Curriculum Vitae of Dr. Vassilios Morellas
TESLA-1004	U.S. Pat. App. Pub. No. 2005/0251325 (“Kudo-325”)
TESLA-1005	U.S. Pat. App. Pub. No. 2004/0128066 (“Kudo-066”)
TESLA-1006	U.S. Pat. App. Pub. No. 2005/0228553 (“Tryon”)
TESLA-1007	U.S. Patent No. 5,471,393 (“Bolger”)
TESLA-1008	U.S. Pat. App. Pub. No. 2005/0125148 (“Van Buer”)
TESLA-1009	U.S. Patent No. 6,484,096 (“Wong”)
TESLA-1010	Complaint, <i>iQar Inc. v. Tesla, Inc.</i> , 1:23-cv-00694, W.D. Tex., June 20, 2023
TESLA-1011	Patent assignment history for Kudo-325
TESLA-1012	Patent assignment history for Kudo-066
TESLA-1013	U.S. Patent No. 6,144,917 (“Walters”)
TESLA-1014	European Pat. App. No. EP 0763712A1 (“Giras”)
TESLA-1015	U.S. Pat. App. Pub. No. 2009/0037089 (“Tkachenko”)
TESLA-1016	U.S. Patent No. 7,163,076 (“Seksaria”)
TESLA-1017	U.S. Patent No. 6,076,623 (“Teraoka”)

TESLA-1018	U.S. Patent No. 5,499,196 (“Pacheco”)
TESLA-1019	Motion to Transfer Venue
TESLA-1020-1049	RESERVED
TESLA-1050	Memorandum, Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation (USPTO June 21, 2022) (“Director’s Guidance”)
TESLA-1051	Proof of Service of Complaint, <i>iQar Inc. v. Tesla, Inc.</i> , 1:23-cv-00694, W.D. Tex., June 20, 2023
TESLA-1052	Deposition of Dr. David M. Bevly (February 5, 2025)
TESLA-1053	Supplemental Declaration of Vassilios Morellas in IPR2024-00543
TESLA-1054	RESERVED
TESLA-1055	Excerpts of Merriam Webster’s Collegiate Dictionary, Eleventh Edition (2003)

I. INTRODUCTION

iQar's Patent Owner Response ("POR") seeks to distinguish asserted prior art. But without claim language to permit such distinction, iQar is forced to resort to implicit constructions in developing its patentability narrative. These constructions clearly depart from plain meaning. While iQar identifies certain examples of specification disclosure that it alleges support its claim interpretation, the law is clear that mere examples are insufficient to justify such departure; instead, clear and unambiguous evidence of disclaimer, disavowal or redefinition is required. *Avid Tech., Inc. v. Harmonic, Inc.*, 812 F.3d 1040 (Fed. Cir. 2016); *Thorner v. Sony Computer Ent. America LLC*, 669 F.3d 1362, 1366-67 (Fed. Cir. 2012). The POR fails to identify such evidence, and iQar's constructions therefore fail as a matter of law.

Specifically, iQar's patentability narrative is rooted in a flawed interpretation of the claims as demanding storage of historical data that uniquely characterize route segments. No such requirement is present in the plain language of the claims, though; the claims merely recite that the stored historical data include "data, **regarding** multiple route segments, gathered from the driver's operation of the vehicle." Importantly, iQar presents only a single argument for patentability of the independent claims, which rests on this unjustified implicit construction of this phrase. When the flaws in this implicit construction are

brought to light, the Challenged Claims are left without any meaningful patentable distinction from the prior art under plain meaning.

iQar also argues for patentability of two dependent claims. Here, too, its arguments do not withstand scrutiny. Instead, iQar's narrative is based on an incomplete understanding of the disclosure of the prior art and its application to the Challenged Claims.

For these reasons, the Panel should therefore reject iQar's arguments and consequently find the Challenged Claims unpatentable.

II. CLAIM CONSTRUCTION

iQar mischaracterizes the '002 Patent in demanding that the stored historical data regarding route segments "indicate how the vehicle actually got from one point to another." POR, 2. This requirement is borne out of iQar's desire to avoid well-known techniques relating to using information about historical vehicle travel patterns to predict the destination of a vehicle's current trip, as taught by the Kudo-325/Kudo-066 combination. But this implicit claim construction advanced by iQar ignores the breadth of the plain language of the claims.

A. iQar's Implicit Constructions Depart From Plain Meaning Without Sufficient Justification

The Petition explained that "no formal claim constructions are necessary." Pet., 2. iQar signaled agreement, noting that "none of the terms of the '002 patent

claims require express construction.” POR, 5. And yet, iQar argues that the Petition “employ[s] erroneously overbroad understanding of certain claim elements that effectively read these elements out of claims.” *Id.* In addressing these purportedly overbroad claim interpretations, iQar offers implicit constructions for claim terms that depart from plain meaning without support for doing so. These departures are unjustified because there is no evidence of clear and unmistakable disclaimer, disavowal, or redefinition, and the POR fails to demonstrate otherwise. The POR similarly fails to meet the standard required for lexicography. *Hill-Rom Services, Inc. v. Stryker Corp.*, 755 F. 3d 1367, 1371 (“The standards for finding lexicography and disavowal are exacting”); *see Thorner v. Sony Computer Ent. Am. LLC*, 669 F.3d 1362, 1365 (Fed. Cir. 2012). Unlike lexicography and disavowal, the specification instead observes “there are many ways to optimize energy efficiency,” *e.g.*, for power management, as recited in the claims, thus confirming that the claims should not be limited in the manner advanced in the POR. TESLA-1001, 7:22-26.

1. ***Route segment ([1b], [1d-1], [1d-2], [15b], [15d], [16d], [16f])***

Claims 1 and 11 describes a ***route segment*** traveled by a vehicle. The plain meaning of “segment” is “a separate piece of something.” *See* TESLA-1053 (citing TESLA-1055, 5). Thus, reference to ***segment*** in relation to ***a route*** means “a separate piece of a route.” *Id.* Further, the plain meaning of “route” is “a

traveled way.” *Id.* (citing TESLA-1055, 4). As such, ***route segment*** traveled by a vehicle plainly means “a separate piece of a traveled way of a vehicle.” *Id.*

2. ***Data, regarding multiple route segments ([1d-1], [15d], [16f])***

The ordinary and readily understood language of the claims of the ’002 Patent imposes no specific requirement on the nature of the “data, regarding multiple route segments” that constitutes part of the historical data of claims 1, 15, and 16. Rather, consistent with the plain meaning of “route segment” advanced *supra*, the plain meaning of the phrase “data, regarding multiple route segments” is simply “data regarding multiple separate pieces of a traveled way of a vehicle.” No further limitation on the nature of the “data” is present in this phrase.

Yet despite the plain language of the claims, iQar demands a narrower interpretation, arguing that the claims of the ’002 Patent require that the recited “data, regarding multiple route segments” “indicate[] how the vehicle actually got from one point to another.” POR, 2; *see* 9-10 (asserting that the “data, regarding multiple route segments” must be “data regarding what occurred—or what path the vehicle traveled—between the different nodes in Kudo 325’s transition state data”). Furthermore, iQar asserts that “data relating to individual ***points*** along a route” is insufficient to satisfy the claimed “data, regarding multiple segments,” because “[p]oint specific data provides no information regarding an actual route, or a portion of an actual route that was traveled.” POR, 10 (emphasis in original).

As an initial matter, iQar’s demand that the data provide “information regarding an actual route” is encumbering the term “route” with implicit requirements that are not found in its plain meaning (“a traveled way,” as discussed *supra*). TESLA-1053 (citing TESLA-1055, 4). That is, the plain meaning of “route” does not impose any particular characteristics or elements that must be satisfied for data to be “regarding,” *e.g.*, to characterize, a route or route segment.

Moreover, it is telling that iQar has failed to identify any support in the claim language itself for this restriction in scope that departs from the plain meaning of the claims. The claims merely recite that the historical data include “data, regarding multiple route segments”—*i.e.*, that the historical data include data regarding multiple separate pieces of a traveled way of a vehicle. They do not require that these data be “data regarding what occurred” ***between*** specific points along a route, as iQar contends. POR, 9. Nor do they require that these data contain “information regarding the route the vehicle traveled between” specific points along a route, as iQar also asserts. POR, 10. And importantly, they do not exclude that information about “individual points” along a route segment (POR, 10) is encompassed within the generic limitation of “data, regarding multiple route segments.”

Even the citations to the '002 Patent that the POR makes in an attempt to justify its untenably narrow claim interpretation do not provide the needed support for the claims. For instance, iQar cites to the '002 Patent's explanation that "a 'segment' may comprise any distance to be traveled, including the entire route, or small portions of the route." POR, 6 (citing TESLA-1001, 14:2-8). Notably, while this is consistent with the plain meaning of route segment ("a separate piece of a traveled way of a vehicle," as discussed *supra*), this description merely provides context for what can constitute a segment. It provides no insight that would support iQar's assertion that the claimed "data, regarding multiple route segments" must provide information about the "route the vehicle traveled" along each route segment. And further citations to the '002 Patent offer no more clarification, instead just restating that "information on routes or segments or routes that the vehicle has previously traveled" (TESLA-1001, 17:32-35, cited at POR, 5) without any specification of precisely what constitutes that "information."

Indeed, even if a route segment itself were "more than a single point along a route" (POR, 6) as asserted by iQar, neither the claim language nor the '002 Patent specification demands that "data, regarding ... route segments" must be anything more than data regarding just a single point along each route segment. In fact, the claims as properly interpreted place no limitation on what the "data, regarding multiple route segments" must be, or in what way the data must relate to the route

segments. In this regard, the Petition’s identification of data characterizing two points along each route segment (namely, the starting point and endpoint of each segment, as discussed *infra*; see Petition, 57-58) is sufficient to satisfy this generic claim limitation, as properly understood.

III. THE COMBINATION OF KUDO-325 AND KUDO-066 RENDERS CLAIMS 1, 15, AND 16 UNPATENTABLE

A. iQar’s argument that Kudo-325’s transition state information does not capture a route traveled between two points is divorced from the plain language of the claims

The Petition demonstrated satisfaction of the claimed “data, regarding multiple route segments” in its identification of, among other things, node IDs for the nodes at the starting point and endpoint of each route segment. Pet., 57; see 36, 57-58 (also identifying date/time, driver/passenger, and frequency information for the nodes at the starting point and endpoint of each route segment). As explained in the Petition, node IDs (and other related information) are “data, regarding” a route segment (*e.g.*, data regarding a separate piece of a traveled way of a vehicle) at least in that a pair of node IDs identify the nodes that define the starting point and the endpoint of that route segment (*e.g.*, the nodes that define that separate piece of the traveled way of the vehicle). *See id.* Similarly, the date/time information for a pair of nodes that define the starting point and the endpoint of that route segment are “data, regarding” that route segment at least in that they

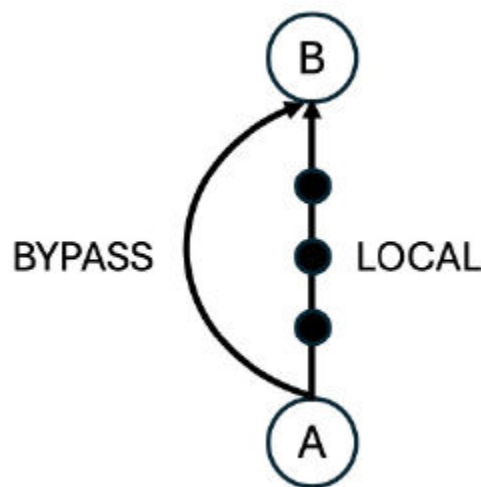
define (1) the date and time at which the driver entered that route segment, (2) the date and time at which the driver exited that route segment, and (3) the elapsed time for the driver to transit that route segment. *See* Petition, 37, 57-58; TESLA-1052, 19:14-20:8.

iQar does not dispute that Kudo-325 stores these data, and even acknowledges that these data are “data relating to individual points along a route.” POR, 10. It does, though, object to the Petition’s identification of information about starting and ending nodes of route segments as corresponding to the claimed “data, regarding multiple route segments,” arguing that “The Petition does not point to the storage of any data regarding what occurred—or what path the vehicle traveled—*between* the different nodes in Kudo 325’s transition state data.” POR, 9; *see id.*, 12 (iQar asserting that Kudo-325 “purposefully *ignores* the route traveled between those points”). But as established *supra*, the claims impose no such requirement that the “data, regarding multiple route segments” provide any sort of characterization of the path between the starting and ending nodes of a route segment, as iQar contends, and thus iQar’s objection to the satisfaction of this claim element by Kudo-325’s data regarding starting and ending nodes of route segments is inapposite.

Notably, iQar provides no explanation of *why* data that characterizes the starting point and endpoint of a route segment should not be considered “data,

regarding” that route segment,” as claimed. Nor does iQar explain why data indicating the times of entry into and exit from a route segment, or data indicating the transit time across that route segment, is not “data, regarding” that route segment. Its sole objection to the Petition’s identification of Kudo-325’s transition state data is based on its nonviable, implicitly articulated, claim construction discussed *supra*.

The error in iQar’s failure to acknowledge these starting and endpoint data as being “data, regarding multiple route segments” comes into greater focus through its provision of an example related to the following figure provided in the POR (*see* POR, 13):



With regard to this figure, iQar argues that “Kudo 325 will record *only* nodes A and B in its transition state data,” and thus that “Kudo 325 *will not distinguish between*—and *saves no information regarding*—the actual route the

vehicle took between intersections A and B,” *e.g.*, whether the vehicle took the “Local” route segment between nodes A and B, or the “Bypass” route segment between the same two nodes. POR, 13-14. Setting aside PO’s incorrect assumption about what Kudo-325 will record with respect to this scenario (discussed *infra*), the question of whether Kudo-325 can or cannot distinguish the “Local” segment from the “Bypass” segment in this example is simply irrelevant to Kudo-325’s satisfaction of the claim language.

Node A defines the start of the Local route segment, and node B defines the end of the Local route segment, as confirmed by Dr. Bevly. *See* TESLA-1052, 14:18-15:3). That is, nodes A and B are information about the start and endpoints of Local route, *i.e.*, “data regarding” the Local route segment. Similarly, Nodes A and B define the start and end of the Bypass route segment, respectively, as also confirmed by Dr. Bevly, and thus nodes A and B are also information about the Bypass route segment, *i.e.*, “data regarding” the Bypass route segment. *See id.*, 16:3-9. That nodes A and B relate to two different route segments does not detract from the simple reality that nodes A and B define, and characterize, the start and endpoints of both of those route segments, *i.e.*, that they are data ***regarding*** both the Local route segment and the Bypass route segment. *See id.*, 16:10-14 (“Q: So is it – can we say that both the local and the bypass portions of these two vehicle

trips have the same start and end points? A. That would be – per this illustration, that would be fair to say.”).

The stored Kudo-325 transition state information is similar: information about the nodes at the start and end of route segments, as stored in Kudo-325’s transition state information, are data that define, and characterize, the start and endpoints of those route segments, *i.e.*, information about nodes at the start and end of route segments are data **regarding** the respective route segments. *See* Pet., 57-58.

Indeed, iQar acknowledges exactly this: that Kudo-325’s “data indicates that the vehicle passed through particular points at particular times.” POR, 10. Its sole objection to the identification of these node data as corresponding to the claimed “data, regarding multiple route segments” is that “it provides no information regarding the route the vehicle traveled between the points” (*id.*)—something that is not even required by the claims. In indicating that Kudo-325’s transition state data are insufficient to satisfy the claims because with Kudo-325’s data, it is purportedly “impossible to tell what route was followed,” iQar appears to be importing a requirement that the “data, regarding multiple route segments” be data that **uniquely** identifies each of the multiple route segments. POR, 14. But the claims require nothing of the sort. Indeed, as discussed *supra*, the claims place no restriction on the nature of the “data, regarding multiple route segments,” nor do

the claims demand that data regarding one route segment be distinct from data regarding a different route segment.

Moreover, as explained in the Petition, Kudo-325's transition state data includes data regarding multiple sequences of route segments, *e.g.*, at least in that the transition state data reflects "histories of past node transition" to a final destination node "where the travel ends." Petition, 54. iQar's brief attempt to argue otherwise by asserting that there is no storage of "any list or sequence of nodes beyond those that are immediately adjacent" ignores the nature of this transition data fails to engage with this fundamental nature of Kudo-325's transition state data. POR, 11.

B. Kudo-325's transition state data render obvious the claimed data regarding multiple route segments even under iQar's narrow claim interpretation

iQar's argument that Kudo-325's node information does not correspond to the claimed "data, regarding multiple route segments" is premised on the idea that it is "impossible to tell what route was followed" between nodes, as indicated in the example figure discussed *supra*. POR, 14. As already established, no such requirement exists in the claims. But even if it did, iQar's objections to the sufficiency of Kudo-325's data fail because of iQar's erroneous assumptions about the scope of the Kudo-325 disclosure.

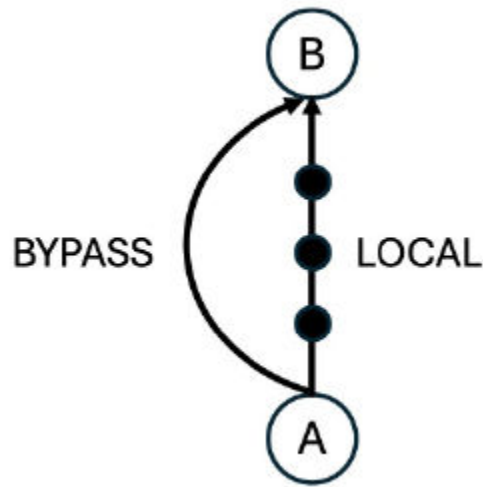
Specifically, iQar asserts that Kudo-325's "point-based data that is stored is *incomplete*." POR, 11 (emphasis in original). This is, of course, irrelevant to Kudo-325's satisfaction of the claims, when properly interpreted, for the reasons discussed *supra*. But iQar's rationale for why Kudo-325's data is incomplete is simply not supported by Kudo-325's own disclosure.

According to iQar, one way in which Kudo-325's transition state information is supposedly incomplete is because "an intersection is only recorded as a node if the vehicle 'travelled in two or more directions' when passing through that intersection." POR, 11, citing TESLA-1004, [0059]. But contrary to iQar's position, this situation is merely an example, and does not limit the full scope of Kudo-325's disclosure. *See* TESLA-1004, [0085] ("It is also noted that any nodes *can be added and deleted* according to user's travels. *For example, it is possible* that an intersection that the user's automobile has traveled in two or more directions *may be set* as a node."). Similarly, although sometimes "[l]ess frequently traversed nodes are ignored," as iQar states (POR, 12-13), its conclusion that this means that Kudo-325's transition state information is incomplete suffers from the same flaw: this is again only an example. *See* TESLA-1004, [0109] ("*the present embodiment* selects only a node appearing with a frequency exceeding the predetermined value in generating the transition state information"). That is, while

Kudo-325 *can* decline to record some intersections as nodes, it is not necessarily the case that it *must* ignore certain intersections.

Fundamentally, Kudo-325 describes simply that “intersections, landmarks, area names, and the like” are indicated as nodes, and “histories of past node transitions” are stored as transition state information. TESLA-1004, [0081], [0093]; *see* Pet., 42, 54. As established *supra*, while Kudo-325 allows for non-recording of certain intersections as nodes, the scope of Kudo-325’s disclosure is not so limited. In the case where nodes are recorded in Kudo-325’s transition state information regardless of, *e.g.*, how often the driver passes through a node or which directions the driver traverses a node, no intersections would be “ignore[d],” as iQar contends. POR, 12. Instead, Kudo-325 encompasses the recordation of all intersections as nodes.

When all intersections are accounted for as nodes—which is consistent with Kudo-325’s disclosure—iQar’s argument that Kudo-325’s transition state information does not allow for a determination of “what route was followed” between nodes becomes unsustainable. POR, 14. This is made clear with reference to iQar’s demonstrative figure, reproduced again here.



iQar explains that in this example, the Local route segment includes “intermediate intersections,” and Dr. Bevly confirms that the black dots along the Local route segment can represent such intermediate intersections. POR, 13; TESLA-1052, 15:4-11. It is within the scope of Kudo-325’s disclosure for these intermediate intersections to be recorded as nodes, as discussed *supra*. And in the case where these intermediate intersections are recorded as nodes, the Local route segment would, in fact, be distinguishable from the Bypass route segment—contrary to iQar’s categorical statement that “Kudo 325 *will not distinguish between* ... the actual route the vehicle took between intersections A and B.” POR, 13-14.

More generally, when the granularity of the stored node data is such that every intersection is recorded as a node, as is contemplated by Kudo-325, iQar’s objection that Kudo-325’s transition state data is incomplete (POR, 11) is obviated. And, importantly, when all available intersections are recorded as nodes, any

uncertainty regarding which of multiple available route segments a driver may have traveled becomes moot: the transition state data fully characterizes “the actual route the vehicle took.” POR, 13.

Thus, to the extent that the claims are interpreted narrowly to require that the “data, regarding multiple route segments” be data that “indicate[] how the vehicle actually got from one point to another” (POR, 2), this recordation of all intersections as nodes does, in fact, provide such an indication. That is, even under iQar’s (unjustified) implicit construction of the claims, the node information of Kudo-325’s transition state data satisfies the “data, regarding multiple route segments” recited in the Challenged Claims.

IV. THE COMBINATION OF KUDO-325 AND KUDO-066 RENDERS CLAIMS 2 AND 3 UNPATENTABLE

Claims 2 and 3 (via their dependency from claim 1) require that at least one of the sensor data samples includes “telemetry data,” which include “map coordinates.” As discussed in the Petition, both latitude/longitude coordinates of the vehicle’s position and the node ID corresponding to that set of coordinates are examples of telemetry data. Pet., 50-52.

iQar does not dispute that both coordinates and corresponding node IDs can be considered sensor data samples or telemetry data. The issue that iQar raises is that while the claims require storage of the sensor data samples, “the system does

not store the position information it collects,” *i.e.*, the coordinates, but instead stores only the corresponding node IDs. POR, 17.

This argument ignores that the Kudo-325/Kudo-066 satisfaction of the claimed telemetry data is two-fold. Latitude/longitude coordinates are telemetry data because they represent measurement data communicated over a distance (*e.g.*, between the vehicle and a GPS satellite or between the vehicle and a remote map database). *See* Petition, 50. iQar does not dispute this. The corresponding node IDs are also telemetry data because they represent measurement data communicated over a distance (*e.g.*, between the server and the vehicle). *See* Petition, 51-52. iQar also does not dispute this. The node IDs—which are telemetry data—are stored, thus satisfying the base claim 1 requirement that at least one of the stored sensor data samples is telemetry data. *See id.*, 50-52. And these node IDs are determined based on, and uniquely correspond to, the latitude/longitude coordinates of the vehicle’s location—also telemetry data—thus satisfying the claim 2-3 requirements that the telemetry data include coordinates. *See* Pet., 52 (“the node ID corresponding to a set of GPS coordinates thus corresponds to ***telemetry data*** because the node ID uniquely corresponds to and represents those GPS-determined coordinates, which themselves correspond to ***telemetry data***”).

Notably, there is no dispute that node IDs are telemetry data, nor that the node IDs are stored. As advanced in the Petition, node ID and corresponding latitude/longitude coordinates are just convenient forms for representing the same quantum of information: the sensed vehicle position. *See* Pet., 27. The precise form of the representation of that position data that is stored—*e.g.*, whether stored as node ID or coordinates—is merely a question of convenience and practicality. By way of analogy, a computer stores binary bits, not Arabic numbers. There is no question that a computer storing a combination of binary bits that corresponds to and represents the Arabic number “25” can be deemed to be storing the Arabic number “25,” even though it is binary bits and not digits that are actually stored. By the same token, storage of a node ID can be considered storage of the latitude/longitude coordinates that uniquely correspond to and are represented by that stored node ID. That is, storage of the node ID corresponding to a set of coordinates is, in fact, equivalent to storage of the coordinates themselves. *See* Pet., 27 (“regardless of the form of the data (*e.g.*, latitude/longitude, node ID, or machine-readable data), position information, when the vehicle is located at a node, corresponds to ***sensor data samples*** because each of these forms of information uniquely corresponds to and represents a quantum of detected position sensor information”).

V. THE COMBINATION OF KUDO-325 AND KUDO-066 RENDERS CLAIM 10 UNPATENTABLE

Claim 10, which depends from claim 8, requires both that the predicted destination is transmitted to a remote database and that the sensor data samples are received by that remote database. The Petition explained that this remote database is rendered obvious by the server-based implementation of Kudo-325's history accumulation database. *See* Pet., 68-71.

As an initial matter, iQar's statement that "[t]he Petition offers no explanation regarding why it would have been obvious in view of the prior art to" send "both the claimed 'sensor data' and the 'predicted destination'" to the remote database simply ignores the straightforward explanation provided in the Petition. As set forth in the Petition, Kudo-325's remotely implemented history accumulation database receives sensor data samples, *e.g.*, node IDs as the vehicle travels along the route—thus satisfying the receipt of sensor data samples required by claim 10. *See* Pet., 73-74. When the vehicle reaches the end of its trip, its location matches its predicted location, and thus the sensor data sample that is transmitted to the remote history accumulation database is, in fact, "the node ID for the predicted destination"—thus also satisfying the transmission of the predicted destination as required by claim 8. Pet., 69-70. Yet iQar opts not to engage with

this robust explanation, instead simply presenting a baseless allegation of purported shortcomings in the Petition.

Instead of addressing the actual challenge to claim 10 presented in the Petition, iQar instead argues that the Petition “ignores half of what Kudo 325 teaches.” POR, 19. Specifically, iQar asserts that Kudo-325’s teaching that its history accumulation database can be at the server is specific to the context of having the server also perform the destination prediction. *See* POR, 19 (citing TESLA-1004 [0108]). Stemming from this understanding of Kudo-325, iQar posits that Kudo-325 contemplates only two alternatives: that “the history data will be uploaded but the prediction will not,” or that “the history data will not be uploaded but the prediction will.” POR, 20.

This is simply not accurate. While it is true that Kudo-325 contemplates both storage of historical data and destination prediction being performed at the server, it is not so limited. Rather, Kudo-325 more generally discloses that “a part of the functions that a car navigation system has may be provided in a server on a network.” TESLA-1004, [0075]; *see* Pet., 68. In other words, further alternatives beyond the two identified by iQar are within the scope of Kudo-325’s disclosure—namely, at least the case of remote storage of historical data and local, on-vehicle destination prediction.

Nevertheless, even to the extent that the two alternatives articulated by iQar are the only options provided by Kudo-325's disclosure (they are not), the Petition's position for claim 10 remains consistent with these options. As noted *supra*, one of the options that iQar contends is offered by Kudo-325 is to "upload all the history data to a server such that prediction is performed remotely." POR, 19. This is perfectly consistent with the situation that occurs in the Kudo-325/Kudo-066 satisfaction of claim 10: all sensor data samples, including sensor data samples along the vehicle's trip as well as the sensor data for the vehicle's final location (*i.e.*, the predicted destination) are provided to the server. The act of predicting the destination can similarly occur at the server, or can remain local to the vehicle. Either way, claim 10 is rendered obvious.

VI. CONCLUSION

For the foregoing reasons, Tesla respectfully requests a final written decision finding the Challenged Claims unpatentable.

Respectfully submitted,

Date: 2-14-25

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CERTIFICATION UNDER 37 CFR § 42.24(d)

Under the provisions of 37 CFR § 42.24(d), the undersigned hereby certifies that the word count for the foregoing Petitioner's Reply to Patent Owner's Response totals 4,494, which is less than the 5,600 allowed under 37 CFR § 42.24(b)(1).

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6(e)(4), the undersigned certifies that on February 14, 2025, a complete and entire copy of this Petitioner's Reply to Patent Owner's Response and all supporting exhibits were provided via email to the Patent Owner by serving the correspondence email addresses of record as follows:

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