

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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KOKI HOLDINGS AMERICA LTD.

Petitioner

v.

KYOCERA Senco Industrial Tools, Inc.

Patent Owner.

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PETITIONER'S PRELIMINARY REPLY TO  
PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION

Case No. IPR2025-00262

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Mail Stop Patent Board  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
PO Box 1450  
Alexandria, VA 22313-1450

Pursuant to the Board’s March 28, 2025 authorization, Koki Holdings America Ltd. (“Petitioner”) hereby files this Reply to address Kyocera Senco Industrial Tools Inc. (“Patent Owner”)’s arguments regarding the constructions of the claim term “lifter.”<sup>1</sup>

## 1. “lifter”

Patent Owner contends that the petition fails identify any corresponding structure from the specification associated with the claimed “lifter” under the means-plus-function claim interpretation. Paper No. 7 at 10. This is incorrect. The Petition identifies the portions of the specification that describe the corresponding structure for the “lifter” when comparing its structure to that of the Lai prior art:

The “lifter member” of the ’954 patent includes a rotatable cam lifter 100 (yellow, below left), with pin 104, 106, and 108 (green) on its face surface that engage protrusions 92 (blue) on the driver member 90 (orange). ’954 patent, 9:25-41, 16:32-46, Fig. 12. The ’954 patent also discloses two-pin variants: lifter members 465 and 480 in Figs. 31, 33. ’954 patent, 32:12-27, 32:45-60.

Petition at 15. The Petition explains how Lai’s prior art lifter has the same structure:

Lai discloses a rotatable cam 5 (yellow, below right), with pins 52A and 52B (green) on its face surface that engage two protrusions 64 and 65 (blue) from a U-shaped member 61 on the driver member 6 (“hammer,” orange). Lai, 1:62-63, 2:14-25, Figs. 4A-D. Lai’s lifter member is moved by a prime mover (“motor 3”). Lai, 2:14-16, Fig. 2.

*Id.* The Petition then illustrates both structures side-by-side. *See id.* at 16. The

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<sup>1</sup> Patent Owner also disputes the construction of “storage chamber,” but this issue does not warrant a reply because the Preliminary Response does not make any arguments not already addressed in the Petition.

Petition does likewise when comparing the corresponding structure to that of the Kondo prior art. *See id.* 76–77.

Date: March 28, 2025

/Amol A. Parikh/

Amol A. Parikh

*Attorney for Petitioner*

**CERTIFICATE OF SERVICE**

Pursuant to 37 CFR § 42.6(e), I certify that on March 28, 2025, Petitioner's Preliminary Reply to Patent Owner's Preliminary Response was served by email on the following counsel for Patent Owner:

Robert S. Rigg  
rrigg@vedderprice.com

Daniel H. Shulman  
dshulman@vedderprice.com

Russell F. Gribbell  
russell@gribbelllaw.com

/Amol A. Parikh/  
Amol A. Parikh

*Attorney for Petitioner*