

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

BULLETPROOF PROPERTY MANAGEMENT, LLC.,
Patent Owner.

IPR2026-00227
Patent 11,932,230

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

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I. PO's Construction Improperly Imports an Unclaimed Limitation

A. The Claims' Plain Language Does Not Support PO's Construction

Seeking to distinguish Joos, PO advances a construction of claim elements 1[f] and 18[g] that would inject requirements for “operator” steering or “driver” actions that appear nowhere in the claims as issued (*see* POPR, 3-4):

P.O. Proposed Construction - Claim 1	
1[f]	the controller operable to select a direction for driving the wheels in response to a pattern of steering angle movements <u>of the operator</u> , without operator indication of a direction.
P.O. Proposed Construction - Claim 18	
18[g]	the offer of an auto-shift being based on <u>the driver's</u> at least one of time traveled from a parked position, distance traveled from a parked position, velocity of travel since parked, steering angle, and vehicle location.

The plain language of the claims does not support this construction. Claim 1 merely refers to “a pattern of steering angle movements,” and the only reference to an “operator” at all is to *exclude* any “operator indication of a direction.” Nothing in the language of claim 1 mandates that the pattern of steering angle movements be made by an operator. PO's position that the parameters (including “steering angle”) recited in 18[g] all must be by “the driver[]” is likewise unsupported and illogical.

PO instead drafted the claims of the '230 Patent broadly to *not* require operator/driving steering. This is evident from the fact that PO secured claims in a related patent explicitly reciting that “the driver [] generate[s] a steering input.” *See* EX1175 (U.S. Pat. 12,221,104), cl. 1. The'230 claims omit any comparable language, and PO's *post hoc* importation of such a limitation is improper. *Magnolia Med. Techs., Inc. v. Kurin, Inc.*, 169 F.4th 1094, 1104 (Fed. Cir. 2026) (“presumed

that different words used in different claims result in a difference in meaning”).

B. The Specification Does Not Support PO’s Construction

PO contends that the specification supports its construction. POPR, 4. Not so. PO’s citations to the specification merely describe examples of a driver steering the vehicle, such as in a “PREFERRED EMBODIMENT” or in “typical operation.” EX1001, 2:11-12, 2:49-53. Nowhere does the specification limit the claimed invention to these examples. On the contrary, the specification discloses that the vehicle 10 can be alternately configured to “enable autonomous or assisted driving” where “autonomous control by the controller ... mov[es] the steering wheel in concert with the wheel angle.” *Id.*, 2:24, 2:40-43. PO errs in excluding these embodiments. *Sisvel Int’l S.A. v. Sierra Wireless, Inc.*, 81 F.4th 1231, 1236 (Fed. Cir. 2023) (“repeatedly warned against confining the claims to those embodiments.”) (quoting *Phillips v. AWH Corp.*, 415 F.3d 1303, 1323 (Fed. Circ. 2005) (en banc)).

C. PO’s Flawed Logical Reasoning Does Not Support The Construction

PO argues that “[a]s the controller is responding to the pattern of steering angle movements, it must be responding to the *operator’s* steering angle movement” since “[a] controller cannot respond to itself.” POPR, 4. But as noted above, this assertion is at odds with the specification, which itself discloses autonomous steering of the exact kind PO now seeks to exclude. EX1001, 2:24, 2:40-43. PO’s position is also reductive. Nothing logically precludes a controller from both controlling

steering and selecting a drive direction in response to steering angle movements. For example, as in Joos, the controller may be configured with logic or sensors that allow it to detect steering angle movements, and the controller may respond to such movements by selecting a forward drive direction—even if the steering angle movements were issued by the controller. *See* Pet., 16-24; EX1003, ¶¶77-88 (addressing how Joos both discloses and renders obvious “in response to” in 1[f]). As the Petition’s evidence demonstrates, controller-issued steering angle movements can also cause the controller to select a drive direction, such as when the steering angle movements are a prerequisite to the selection as in Joos. *Id.* Indeed, the controller could not then select the drive direction absent the steering angle movements. *Id.*

II. The Petition’s Joos-Bayer and Joos-Bettger Grounds Still Meet PO’s Construction

Even if PO’s construction applied, the Petition presents grounds that would render the challenged claims obvious. For example, Grounds 3A-3D cite Bayer’s driver-led steering assistance techniques, and the proposed combinations integrate Bayer’s techniques in Joos consistent with Joos’s semi-autonomous operation. EX1007, [0014]-[0016], [0045]-[0046], [0057]-[0058], [0065]; Pet., 64-69.

The Joos-Bettger combinations in Grounds 2A-2D likewise address how a driver’s steering angle movements cause the controller to shift to drive consistent with Bettger’s teachings as applied in Joos. *See* EX1006, [0044]-[0045]; Pet., 54-62.

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Respectfully submitted,

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CERTIFICATE OF SERVICE

Pursuant to 37 CFR § 42.6(e)(4), the undersigned certifies that on June 2, 2026, a complete and entire copy of this Petitioner's Reply to Patent Owner's Preliminary Response was provided by email to the Patent Owner by serving the correspondence address of record as follows:

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