

### REMARKS

Claims 1-4 are pending. Claim 1 is amended in the amendments above. For the reasons set forth below, it is respectfully submitted that all pending claims are allowable.

### CLAIM REJECTIONS UNDER 35 U.S.C. § 102

Claims 1-4 stand rejected under 35 U.S.C. § 102 as allegedly being unpatentable over U.S. Pub. 2018/0358667 to Harris *et al.*, (hereinafter *Harris*).

Amended claim 1 recites:

A stackable battery system comprising:  
at least two bussing housings, said bussing housings each having: a top electrical connector, a bottom electrical connector operable to electrically mate with the top connector of another bussing housing, a top mechanical connector, and a bottom mechanical connector operable to hold said bussing housing motionless in at least one dimension relative to another bussing housing when in close proximity; **at least one bus tube**, at least one **pair of battery cells coupled to each other and connected to said bussing housing at the at least one bus tube**; wherein said bussing housings together form a *stacked* battery with performance characteristics superior to that of each of the individual cell modules.

*Harris* does not teach “[a] stackable battery system comprising ... at least one bus tube, at least one pair of battery cells coupled to each other and connected to said bussing housing at the at least one bus tube,” as recited in amended claim 1. For example, nothing in *Harris* teaches at least one bus tube. More specifically, nothing in *Harris* teaches “at least one pair of battery cells coupled to each other and connected to said bussing housing **at the at least one bus tube**.” Rather, *Harris* teaches battery cells within battery modules. Furthermore, any cylindrical power connectors in *Harris* are not bus tubes and connect entire battery modules together, not “at least one pair of battery cells” connected to each other that can then be stacked together with other bus tube/battery cell combinations to form “a stacked battery.”

For the reasons discussed above, *Harris* does not teach the subject matter of amended claim 1. Accordingly, Applicant respectfully request that the 35 U.S.C. § 102 rejection of claims be withdrawn. Claims 2-4 are allowable based at least on their dependance from claim 1, and their own novel and inventive features. Accordingly, Applicant respectfully request that the 35 U.S.C.

§ 102 rejections of the dependent claims be withdrawn.

### **CONCLUSION**

The right is reserved to pursue claims to any subject matter supported by the disclosure of this application in one or more continuation and/or divisional applications at a later time, including the subject matter of any previously pending claims regardless of whether those claims were amended or cancelled herein. This may entail the pursuit of broader claims, narrower claims, and subject matter that was previously relinquished by virtue of argument or amendment.

Any silence with regard to the rejections of and/or objections to previously pending dependent claims constitutes a recognition that such are moot based on amendments or remarks made with respect to the independent claim from which the dependent claims depend. Such silence does not constitute a *de facto* acquiescence to any objection and/or rejection.

In view of the foregoing, it is respectfully submitted that all claims are in allowable form. In the event that the Examiner deems that a discussion would be helpful in advancing prosecution, the Examiner is invited to call the undersigned at (949) 502-2870. The USPTO is hereby authorized to charge any outstanding fees to Deposit Account No. 50-5201.

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Respectfully submitted,

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