REMARKS

Claims 1-22 are currently pending in this application. Claims 1 and 19-22 are presently amended. Claims 12, 14-16, and 18 were previously withdrawn.

Objection to the Specification

The specification is objected to because claim 1 recited a first, second, and third axis. Claim 1 is amended to recite a single manual actuation lever mounted to the support body such that the lever rotates about first and second pivots on separate parallel axes. Support for the first and second pivots is found at least in paragraphs [0053], [0054], [0057], [0058], [0065], [0066], [0075], and [0079], as well as original claims 9 and 10. One of ordinary skill recognizes that the pivots 14, 18 each have an axis of rotation. The axes are also explicitly disclosed at least in paragraph [0053]. Accordingly, withdrawal of the objection to the specification is respectfully requested.

Claim Rejections - 35 U.S.C. §102

Claims 19-22 are rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent 3,972,247 ("Armstrong"). Applicants respectfully traverse this rejection.

Claims 19-21 each recite the first pawl is integrally formed with (or as a portion of) a driven arm of the lever. The Examiner continues to characterize the first pawl as Armstrong's advance pawl 98, and the lever as Armstrong's elongated

handle portion 112. As previously explained, Armstrong's advance pawl 98 is **not integrally formed** with the handle portion 112. Armstrong discloses "[r]eferring now to the advance means 36 as more particularly illustrated in FIGS. 2 and 3, it will be seen to be comprised of an advance pawl pivot pin 96, a pivotally mounted advance pawl 98 and an advance pawl torsion spring 100. The advance pawl pivot pin 96 is formed from a projection which is suitably connected to the operator control means 38 and as such is movable conjointly therewith. Advance pawl 98 is supported by the advance pawl pivot pin 96 and has a leg portion 102 with a contact end 104, and lower surface 103. ... Advance pawl torsion spring 100 has one end contacting an abutment surface suitably formed on the operator control means 38 and the opposite end engaging the leg portion 102." (*See* Armstrong col. 9, lines 37-47 and lines 50-53) (emphasis added). The advance pawl torsion spring 100 transmits motion between the handle portion 112 (part of the operator control means 38 – as shown in Figure 1) and the advance pawl 98 via abutment with the leg portion 102. The Examiner asserts that the pawl 98 is mounted to lever 110 in a manner such that "they move integrally in a circumferential motion – as depicted in Figures 3-5 – which is a structural relationship that fits within the scope of the broadest reasonable interpretation of the claim limitation at issue." (*See* May 20, 2014 Action, page 12). The Examiner's assertion is contrary to the disclosure of Armstrong. The Examiner argues limitations that are not recited in the claims and are not the subject of the present application. The rejected claims recite the first

pawl is integrally formed with a driven arm of the lever; Armstrong discloses a torsion spring is arranged between its first pawl and driven arm of the lever. The presence of an additional mechanical motion transmission element (*i.e.* the torsion spring 100) physically engaged between the first pawl 98 and the handle portion 112 necessarily means that the first pawl 98 and handle portion 112 cannot be integrally formed. In contrast, the first pawl 98 rotates about advance pawl pivot pin 96 with respect to handle portion 112, so that the first pawl 98 and the handle portion 112 do **not** move in unison. Accordingly, the Examiner's interpretation regarding Armstrong's first pawl 98 and handle portion 112 is demonstrably flawed, and Armstrong fails to disclose the first pawl is **integrally formed** with a driven arm of the lever as required by claims 19-21. Applicants reject that the Examiner's interpretation of Armstrong fits within the scope of the broadest reasonable interpretation of the claim limitations because Armstrong explicitly discloses a contrary teaching, *i.e.* the torsion spring 100 is arranged between the first pawl 98 and the handle portion 112 so that the first pawl 98 rotates about advance pawl pivot pin 96 with respect to handle portion 112.

Claims 19-21 also recite a swinging member having a driven arm and a driving arm, the swinging member is pivoted onto the support body about a swinging member pivot that is positioned between the driven arm and the driving arm. The Examiner cited Armstrong's stop pawl 76 as the swinging member and cites a portion of the leg portion 84 contacting teeth 66 as the driven arm and a

portion of the leg portion 84 contacting 86 as the driving arm. As clearly shown in Figures 3-7, Armstrong's stop pawl 76 is attached to the support body via a pivot pin 80, and includes a **single arm portion 84**. Armstrong clearly fails to disclose a driven arm and driving arm with a swinging member pivot positioned between them as recited by claims 19-21.

Claim 22 recites a lever that rotates about first and second pivots having separate parallel axes, and a first pawl that has a connection to a driven arm of the lever. The first pawl, in a plane orthogonal to the separate parallel axes about which the lever rotates (which, for example, is the drawing plan of Figure 2 of the present application), is **only** capable of rotating about the axis of the first and/or second pivot with the driven arm of the lever when the driven arm of the lever rotates about the axes of the first and second pivots. In its movement in said plane orthogonal to the separate parallel axes, the first pawl of claim 22 is **only** capable of rotating about the axis of the first and/or the second pivot with the driven arm of the lever – the first pawl is not capable of rotating with respect to the driven arm of the lever about any additional axis that is parallel to the axes of the first and second pivots. Armstrong discloses exactly the opposite arrangement. Armstrong discloses the first pawl 98 rotates about axis 64 with the lever 110 in the drawing plane of Figure 3, but the first pawl 98 has a **pivoting connection** to the lever 110 at the advance pawl pivot pin 96, which has a **parallel axis** to axis 64. Thus, in the drawing plane of Figure 3, the pawl 98 is **not only** capable of rotating about the

axis of the first pivot 64 in unison with the driven arm of the lever 110 as required by claim 22, rather it is also capable of rotating about the **additional axis** of advance pawl pivot pin 96.

In view of these differences, claims 19-22 are patentable over Armstrong and the rejection of these claims should be withdrawn.

Claims 1-11, 13, and 17 are rejected under 35 U.S.C. §102 as being anticipated by U.S. Pub. 2006/0207375 ("Jordan"). Applicants respectfully traverse this rejection.

Claim 1 recites a first pawl that has a connection to a driven arm of the lever and moves with the driven arm of the lever, the first pawl is capable of rotating about the axis of the first and/or the second pivot with the driven arm of the lever when the driven arm of the lever rotates about the axes of the first and second pivots, but the first pawl is not capable of rotating with respect to the driven arm of the lever about any pivot having an axis parallel to the axes of the first and second pivots.

As clearly shown in Figures 3a-3f of Jordan, the pawl nose 96 pivots about an axis of holding pawl pivot 70, which is completely different than an axis of a first or second pivot of a driven arm of the lever 20. Jordan's pawl 84 is **also** pivotably connected at a drive pawl pivot 90 which is parallel to axis 32. The first pawl of claim 1 is capable of rotating about the axis of the first and/or the second pivot with the driven arm of the lever, but the first pawl is not capable of rotating with respect

to the driven arm of the lever about any additional axis that is parallel to the axes of the first and second pivots. Jordan fails to disclose a first pawl that has a connection to a driven arm of the lever 20 and moves with the driven arm of the lever 20, the first pawl is capable of rotating about the axis of the first and/or the second pivot with the driven arm of the lever 20 when the driven arm of the lever 20 rotates about the axes of the first and second pivots, but the first pawl is not capable of rotating with respect to the driven arm of the lever 20 about any pivot having an axis parallel to the axes of the first and second pivots as required by claim 1. On page 8 of the current Office Action, the Examiner identified a first axis for the shaft 32 and a second axis for a preload return spring 50. As shown in Figure 1 of Jordan, the axis or pivot for shaft 32 and the axis 48 of preload return spring 50 are **perpendicular to each other** and the axes 32, 48 (50) are **not** parallel to each other.

The Examiner also mentions that the lever 20 of Jordan rotates about axis 70. (See current Office Action, page 8). As clearly shown in Figure 2, however, lever 20 does not rotate about axis 70. Element 70 is holding pawl pivot (*see* Jordan paragraph [0018]) and lever 20 just rotates about axis 32.

In view of these differences, claim 1 is patentable over Jordan and the rejection should be withdrawn. Claims 2-11, 13, and 17 depend from claim 1 and are similarly patentable over Jordan for the reasons noted above.

Conclusion

If the Examiner believes that an interview will advance prosecution of the application, the Examiner is respectfully requested to contact the undersigned to schedule an interview at the Examiner's convenience.

In view of the foregoing amendment and remarks, Applicants respectfully submit that the present application, including claims 1-22, is in condition for allowance and a notice to that effect is respectfully requested.

Respectfully submitted,

Dal Prà et al.

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