

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UUSI, LLC, a Michigan domestic limited
Liability company, d/b/a NARTRON,

Plaintiff,

Civil Action No: 2:13-cv-10444

vs.

and

ROBERT BOSCH LLC, a Michigan
Corporation, and BROSE NORTH
AMERICA, INC.,
a Michigan corporation,

Civil Action No. 2:13-cv-11704

and

HON. ARTHUR J. TARNOW
Mag. Judge Randon

WEBASTO ROOF SYSTEMS, INC.,
a Delaware Corporation,

Defendants.

_____ /

**PLAINTIFF UUSI NARTRON'S EXPEDITED MOTION TO STAY
PENDING *INTER PARTES* REVIEW**

Plaintiff UUSI, LLC d/b/a Nartron (“UUSI”) hereby moves this Court to stay this action pending determination of an *inter partes* review of United States Patents 8,217,612 (“the ‘612 Patent”), 7,579,802 (“the ‘802 Patent”) and U.S. Patent No. 7,548,037 (“the ‘037 Patent”).¹ The parties have exchanged proposed stipulations. There is a need for the Court’s intervention, however, as the parties are at odds on the breadth and wording of the stipulations.

A stay is appropriate because (1) the parties are in agreement that a stay is the proper course of action, (2) a stay would not prejudice or present a clear tactical disadvantage to defendants Robert Bosch LLC (“Bosch”), Brose North America, Inc. (“Brose”), and Webasto Roof Systems, Inc. (“Webasto”), (3) a stay will greatly simplify the issues in question and therefore trial, and (4) the case is still in the early stages of litigation, before completion of discovery before the exchange of claim construction positions and before a *Markman* hearing.²

USSI’s counsel certifies compliance was sought via email and phone conference under Local Rule 7.1(a) prior to filing this motion.

¹ UUSI has filed an identical motion in UUSI’s case versus Defendant Webasto Roof Systems, Inc. (“Webasto”).

² UUSI requests the Court hold all dates in abeyance pending the Court’s determination of the Expedited Motion for Stay.

For the reasons set forth above and in the supporting Memorandum concurrently filed with this Motion, UUSI respectfully requests that this Court stay this proceeding pending the PTO's resolution of the inter partes review.

Dated: April 21, 2014

Respectfully submitted,

s/ George D. Moustakas /

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**MEMORANDUM IN SUPPORT OF PLAINTIFF UUSI, LLC
d/b/a NARTRON'S EXPEDITED MOTION TO STAY
PENDING INTER PARTES REVIEW**

ISSUES PRESENTED

Should this patent infringement suit be stayed to permit the U.S. Patent and Trademark Office to review the validity of the claims of United States Patent Nos. 8,217,612 (“the ‘612 patent”), 7,579,802 (“the ‘802 patent”), and 7,548,037 (“the ‘037 Patent”)?

Answer: Yes

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