

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY

Petitioner,

v.

VERSATA SOFTWARE, INC.

Patent Owner.

U.S. Patent No. 7,739,080

CBM Case No.: CBM2016-00101

**PETITION FOR POST-GRANT REVIEW (COVERED BUSINESS
METHOD REVIEW) UNDER 35 U.S.C. §321 AND
§18 OF THE LEAHY-SMITH AMERICA INVENTS ACT
(CLAIMS 1-22 OF U.S. PATENT NO. 7,739,080)**

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List of Exhibits

Exhibit No.	Description	Identifier
1001	U.S. Patent No. 7,739,080	'080 patent
1002	Versata Complaint in the <i>Versata</i> lawsuit	
1003	Versata Counterclaim in the <i>Ford</i> lawsuit	
1004	<i>A Guide to the Legislative History of the America Invents Act; Part II of II</i> , 21 Fed. Cir. Bar J. No. 4 (2002), pp. 539-653	AIA Legislative History Guide
1005	U.S. Patent No. 7,200,582	'582 patent
1006	Declaration of Deborah L. McGuinness	McGuinness Decl.
1007	File history of the '080 patent	'080 file history
1008	McGuinness <i>Curriculum Vitae</i>	
1009	Stefik, <i>Introduction to Knowledge Systems</i> (1995)	Stefik
1010	McDermott, <i>RI: an Expert in the Computer Systems Domain</i> , Proceedings AAAI-80 (1980)	McDermott
1011	McGuinness et al., <i>An Industrial-Strength Description Logic-Based Configurator Platform</i> , IEEE Intelligent Systems (1998)	
1012	McGuinness et al., <i>Description Logic in Practice: A CLASSIC: Application</i> , Proceedings of the 14th International Joint Conference on Artificial Intelligence, Montreal, Canada, (August 1995)	
1013	Versata's identification of "means" structure for claim 22 of the '080 patent from the <i>Ford</i> lawsuit	
1014	Versata's Opening Claim Construction Brief in the <i>Ford</i> lawsuit	

Mandatory Notices Under 37 C.F.R. § 42.8

Real Party-In-Interest – 37 C.F.R. § 42.8(b)(1)

Petitioner certifies that Ford Motor Company (“Ford”) is the real party-in-interest.

Related Matters – 37 C.F.R. § 42.8(b)(2)

Petitioner identifies the following related judicial matter: *Ford Motor Co. v. Versata Software, Inc.*, Case No. 2:15-cv-10628-MFL-EAS (“the *Ford* lawsuit”). U.S. Patent No. 7,739,080 (“the ‘080 Patent”) is being asserted by Versata in the *Ford* lawsuit, along with seven additional patents. In connection with the *Ford* lawsuit, Versata Software, Inc. has stated that it “holds all right, title, and interest in and to the ‘080 Patent.”¹ (Ex. 1003 at 2, 36.)

The ‘080 Patent was also asserted in *Versata Dev. Grp., Inc. v. Ford Motor Co.*, Case No. 4:15-cv-00316-RC-CMC (“the *Versata* lawsuit”). (Exh. 1002.) The *Versata* lawsuit was dismissed without prejudice on December 3, 2015.

Petitioner has not filed any concurrent petitions concerning the ‘080 Patent.

Lead and Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)

Petitioner appoints Thomas A. Lewry (Reg. No. 30,770) of Brooks Kushman P.C. as lead counsel, and appoints John S. LeRoy (Reg. No. 48,158),

¹ The most recent assignment recorded with the U.S. Patent and Trademark Office states that the assignee of the ‘825 Patent is Versata Development Group, Inc.

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