### IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Inter Partes Review of:

Trial Number: To Be Assigned

U.S. Patent No. 6,998,973

Filed: February 5, 2004

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Attorney Docket No.: 73139/000005

Panel: To Be Assigned

Inventor(s): Lefaure, Philippe

Assignee: Continental Automotive Systems US, Inc.

Title: DATA TRANSMISSION METHOD

FOR A TIRE PRESSURE MONITORING

SYSTEM OF A VEHICLE

Mail Stop Patent Board Patent Trial and Appeal Board P.O. Box 1450 Alexandria, VA 22313-1450

PETITION FOR INTER PARTES REVIEW UNDER 37 C.F.R. § 42.100



# TABLE OF CONTENTS

I.		M	ANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)	1		
	A.	Re	eal Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)	1		
	B.	Re	elated Matters Under 37 C.F.R. § 42.8(b)(2)	1		
	C.	Le	ad and Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3)	1		
	D.	Se	rvice Information Under 37 C.F.R. § 42.8(b)(4)	2		
II.		PA	YMENT OF FEES UNDER 37 C.F.R. § 42.103	2		
III	•	SU	JMMARY OF THE '973 PATENT	2		
	A.	De	Description of the Alleged Invention of the '973 Patent2			
	В.	3. Summary of the Prosecution History of the '973 Patent		4		
	C.	C. Summary of Continental's Litigation Positions Regarding the '973 Patent		∠		
IV 37	-		EQUIREMENTS FOR <i>INTER PARTES</i> REVIEW UNDER . §§ 42.104	5		
	A.	Gr	ounds for Standing Under 37 C.F.R. § 42.104(a)	5		
	В.		entification of Challenge Under 37 C.F.R. § 42.104(b) and Relief equested	<i>6</i>		
		1.	Claims for Which <i>Inter Partes</i> Review Is Requested (37 C.F.R. § 42.104(b)(1))	<i>6</i>		
		2.	The Specific Art and Statutory Ground(s) on Which the Challenge Is Based Under 37 C.F.R. § 42.104(b)(2)	<i>6</i>		
		3.	How the Challenged Claim(s) Are to Be Construed (37 C.F.R. §42.104(b)(3))	7		
			a. "Natural Time Lag"			
			b. "Used to Prevent Collisions"	10		
			c. "Precision of an RC-type oscillator"	11		
		4.	How the Construed Claim(s) Are Unpatentable (37 C.F.R. § 42.104(b)(4))	11		
		5.	Supporting Evidence (37 C.F.R. § 42.104(b)(5))	12		
V.		BF	RIEF DESCRIPTION OF PRIOR ART RELIED UPON	12		
	A.	U.	S. Patent No. 6,271,748 to Derbyshire (Exh. 1003)	12		



B. U.S. Patent No. 6,404,246 to Estakhri (Exh. 1004)	12
C. U.S. Patent No. 5,883,582 to Bowers (Exh. 1005)	13
D. U.S. Patent No. 6,486,773 to Bailie (Exh. 1006)	13
VI. DETAILED EXPLANATION OF PERTINENCE AND MANNER OF APPLYING CITED PRIOR ART TO EVERY CLAIM FOR WHICH REVIEW IS REQUESTED UNDER 37 C.F.R. § 42.104(b)	15
A. Claims 1-2, 4-5, 7, 9 and 11 are Anticipated Under 35 U.S.C. §102(b)  Over Derbyshire	15
B. Claims 3, 7, 8, 10 and 11 are Obvious Under 35 U.S.C. §103(a) Over Derbyshire	16
C. Claims 1-5, 7-11 are Obvious Under 35 U.S.C. §103(a) Over Derbyshire In View of Estakhri	16
D. Claims 1-5 and 7-11 are Obvious Under 35 U.S.C. §103(a) Over Derbyshire In View of Bowers	17
E. Claims 1-5 and 7-11 are Obvious Under 35 U.S.C. §103(a) Over Derbyshire In View of Bailie	18
F. Claims 1, 4-5, 7 and 9-11 are Anticipated Under 35 U.S.C. §102(b) In View of Bailie	21
G. Claims 1-5, 7 and 9-11 are Obvious Under 35 U.S.C. §103(a) Over Bailie In View of Estakhri	21
H. Claims 1-5 and 7-11 are Obvious Under 35 U.S.C. §103(a) Over Bailie In View of Bowers	22
I. Claims 1-5 and 7-11 are Obvious Under 35 U.S.C. §103(a) Over Derbyshire, Bailie and Bowers	23
VII. CONCLUSION	



Inter partes review is respectfully requested for claims 1-5 and 7-11 of U.S. Patent No. 6,998,973 ("the '973 Patent")(Exh. 1001).

## I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)

The following mandatory notices are provided as part of this Petition.

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

Schrader-Bridgeport International, Inc. and Schrader Electronics, Inc. ("Schrader") are the real parties-in-interest for Petitioner.

## B. Related Matters Under 37 C.F.R. § 42.8(b)(2)

The '973 Patent is presently the subject of a patent infringement lawsuit brought by the assignee, Continental Automotive Systems US, Inc. and captioned Continental Automotive Systems US, Inc. v. Schrader Electronics, Inc. et al., USDC Eastern District of Michigan, Case No.: 2:11-cv-14525-SJM-MJH.

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

Petitioner provides the following designation of counsel.

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### D. Service Information Under 37 C.F.R. § 42.8(b)(4)

Service of any documents via hand-delivery may be made at the postal mailing address of the respective lead or back-up counsel designated above with courtesy email copies to the email addresses and docket ip@pillsburylaw.com.

# II. PAYMENT OF FEES UNDER 37 C.F.R. § 42.103

The undersigned authorizes the Office to charge \$27,200.00 to Deposit Account No. 033975 for the fee set forth in 37 C.F.R. § 42.15(a) for this Petition for *Inter Partes* Review. The undersigned further authorizes payment for any additional fees that might be due in connection with this Petition to be charged to the above-referenced Deposit Account.

### III. SUMMARY OF THE '973 PATENT

# A. Description of the Alleged Invention of the '973 Patent

For the '973 Patent, the purported invention relates to a data transmission method for a tire-pressure monitoring system ("TPMS") of a vehicle. In particular, the patent claims a method of transmitting data by wheel unit sensors to a central computer located in the vehicle. The method comprises differing data transmission phases in parking mode and running mode, wherein the parking mode transmissions are less frequent than the running mode transmissions. The concept of reducing the number of transmissions of a TPMS sensor while the vehicle is stopped was well known at the time of the filing of the '973 Patent as disclosed in the prior art references and in the '973 Patent Specification which states, "It is also



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