

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOYOTA MOTOR CORPORATION

Petitioner

v.

AMERICAN VEHICULAR SCIENCES LLC

Patent Owner

Patent No. 5,845,000

Issue Date: December 1, 1998

Title: OPTICAL IDENTIFICATION AND MONITORING SYSTEM USING  
PATTERN RECOGNITION FOR USE WITH VEHICLES

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**Petitioner's Mandatory Notices – Addition of Back-up Counsel**  
**37 C.F.R. § 42.8**

Case No. IPR2013-00424

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Petitioner Toyota Motor Corporation (“Petitioner”) hereby provides notice that it has added Antony Pfeffer as back-up counsel in this proceeding. Pursuant to 37 C.F.R. § 42.8(a)(3), Petitioner’s updated mandatory notices are below, reflecting the addition of Mr. Pfeffer.

**Mandatory Notices (37 C.F.R. § 42.8)**

**A. Real Party-in-Interest (37 C.F.R. § 42.8(b)(1))**

Petitioner, Toyota, is the real party-in-interest.

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

The ’000 patent is currently the subject of the following litigations: *American Vehicular Sciences LLC v. Toyota Motor Corp. et al.*, No. 6:12-CV-406 (E.D. Tex.) (“AVS 406 Litigation”); *American Vehicular Sciences LLC v. Mercedes-Benz U.S. Int’l, Inc.*, Case No. 6:13-CV-308 (E.D. Tex.); and *American Vehicular Sciences LLC v. BMW Group*, Case No. 6:12-CV-413 (E.D. Tex.). Petitioner is a named defendant in the AVS 406 Litigation. The earliest that any of the defendants in the AVS 406 Litigation were served with the complaint is July 20, 2012. The petition in this proceeding was filed simultaneously with IPR2013-00419, -00420, -00421, -00422 and -00423. A trial has been instituted in each. While these proceedings do not directly address the claims of the ’000 patent, they relate to patents that were asserted against similar products of Toyota in a related case: *American Vehicular Sciences LLC v. Toyota Motor Corp. et al.*, 12-CV-410 (E.D. Tex.) (hereinafter, “410 Litigation”). Petitioner is not aware of any other pending judicial or administrative matter that would affect, or be affected by, a

decision in this proceeding.

**C. Counsel & Service Information (37 C.F.R. §§ 42.8(b)(3)-(4))**

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A. Antony Pfeffer (Reg. No. 43,857)

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Dated: March 3, 2014

/Matt Berkowitz/

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## CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing *Petitioner's Mandatory Notices – Addition of Back-up Counsel* was served on March 3, 2014 via e-mail upon the following counsel of record for Patent Owner:

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