

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**TOYOTA MOTOR NORTH AMERICA, INC., SUBARU OF AMERICA, INC., FORD MOTOR
COMPANY, JAGUAR LAND ROVER NORTH AMERICA, LLC, and VOLVO CARS OF
NORTH AMERICA, LLC,
Petitioner,**

v.

**CRUISE CONTROL TECHNOLOGIES LLC,
Patent Owner.**

**Case IPR2014-00280
Patent 6,324,463 B1**

Patent Owner's Demonstrative Exhibits for Oral Hearing

Instituted Anticipation Grounds

- Ground A: Diamante Owner's Manual ("Diamante") anticipates claims 1-3, 5, 12-16, 21, 25, 26 and 28;
- Ground D: Watanabe anticipates claims 18 and 19; and
- Ground E: Celsior Owner's Manual ("Celsior") anticipates claims 2-5, 26-28 and 34-36.

Diamante's "cruise control" system

Cruise control★ (automatic fixed-speed cruising system)

J110B-DB

Cruise control is a system that allows the vehicle to cruise at a constant speed (from approximately 40–100 km/h) without depressing the accelerator pedal.

Caution ● For your safety, do not use cruise control on the following types of roads.



- On roads where appropriate distance cannot be maintained between vehicles due to heavy traffic
- Around sharp bends and on roads where visibility is poor
- On slippery roads (such as icy, snow-covered, or wet roads as well as gravel roads)
- On long, steep downhill slopes

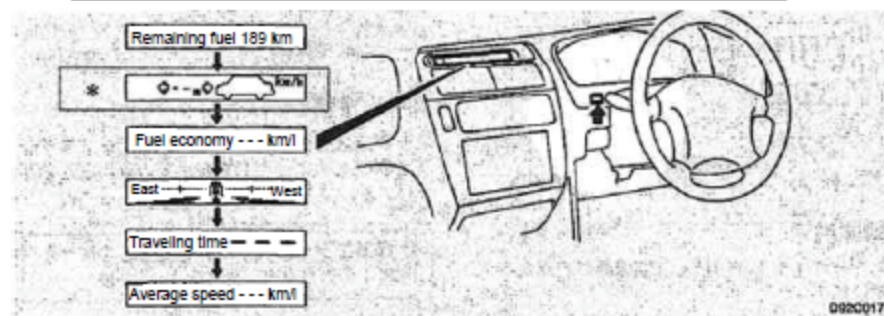
Ex. 1004, p. 86

● MODE switch

JD92G-BB

1. Each time the MODE switch is pressed, the item displayed is changed in the following order: cruising distance, preview distance control information, instantaneous fuel economy, directions, traveling time, and average speed.

*: Only vehicles with preview distance control display this item. See page 88.



092C017D

Ex. 1004, p. 52

Advice



- Gently pushing the control lever upward or downward and releasing it changes the speed by approximately 1.5 km/h, so you can finely adjust the preset speed.

Ex. 1004, p. 87

Diamante's "preview distance control" system

Preview distance control (vehicle-to-vehicle distance control system)

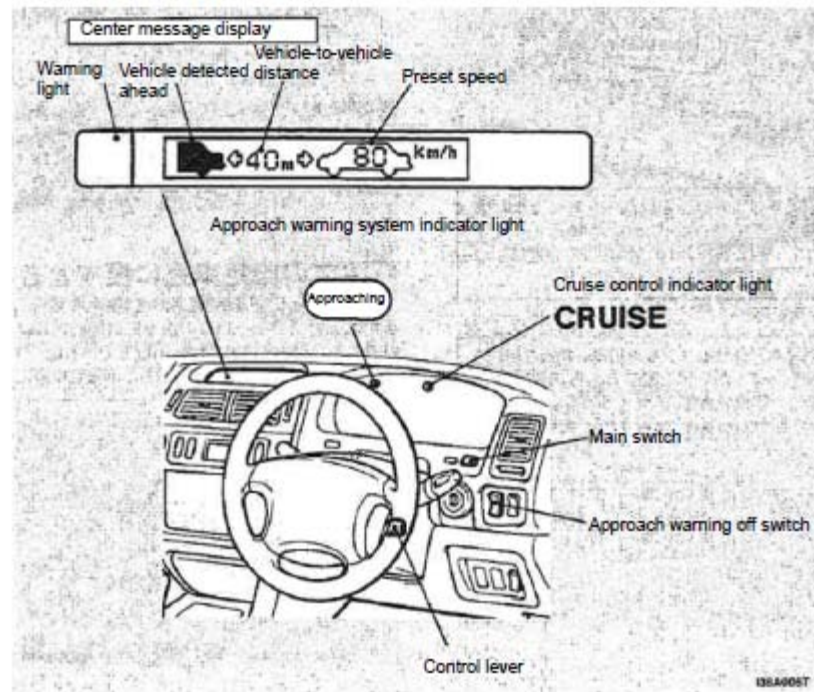
J138A-BA

Preview distance control is a system that controls the distance between your vehicle and the vehicle ahead (vehicle-to-vehicle distance) to maintain an appropriate distance after the desired vehicle speed (preset speed) has been set.

When the system determines that it cannot maintain an appropriate distance because the vehicle ahead has decelerated abruptly or another vehicle has cut in ahead of you, the system issues an approach warning (turns on or flashes the warning light and beeps a warning) to alert you. When no vehicle is detected ahead, the system cruises the vehicle at the preset speed.

The approach warning can also be used by itself.

- Caution**
- This system provides assistance for safe driving. Do not overly rely on the system, since preview distance control has limits. Always pay attention to vehicle-to-vehicle distance, keeping safe driving mind.
 - While cruising at a low speed, the system does not issue a warning nor display the vehicle-to-vehicle distance, so exercise caution when driving.
 - Do not use preview distance control under the traffic and weather conditions or on the types of road described below to avoid serious injury or death.
 - In traffic conditions under which acceleration and deceleration are frequently repeated
 - In traffic conditions under which an appropriate distance cannot be maintained between vehicles due to heavy traffic
 - At sharp bends and on roads where visibility is poor
 - On slippery roads (such as icy, snow-covered, or wet roads as well as gravel roads)
 - In bad weather (such as dense fog, heavy rain, or snow)
 - On long, steep downhill slopes
 - The system cannot maintain an appropriate distance if the vehicle ahead has higher ground clearance (such as a trailer) or the reflectors of the vehicle ahead are extremely dirty.



Ex. 1004, p. 88


- Gently push the control lever upward or downward and then release it to finely adjust the preset speed by approximately 1.0 km/h.

Ex. 1004, p. 88

Ex. 1004, p. 91

Anticipation Allegations Are All Based On Cruise Control System and Preview Distance Control

Pet. at 18-19 (cites to “cruise control” system of Diamante)

Claim 1 of the '463 patent	Anticipated by Diamante Owner's Manual
1. A cruise control system for vehicle having a human operator, comprising:	<p>Cruise control★ (automatic fixed-speed cruising system)</p> <p style="text-align: right; font-size: small;">J110B-DB</p> <p>Cruise control is a system that allows the vehicle to cruise at a constant speed (from approximately 40–100 km/h) without depressing the accelerator pedal.</p> <p>Ex. 1004 at p. 86.</p>
[1(a)] a speed controller that automatically maintains the vehicle speed at a preset speed;	See disclosures cited in response to claim 1 preamble.
[1(b)] an enable switch associated with said controller for enabling the system;	<p>Setting cruise control</p> <p>1. Push the main switch to turn cruise control on. The indicator light on the switch turns on.</p>  <p>Ex. 1004 at p. 86.</p>
[1(c)] a set speed input in communication with said controller for manually setting the speed of the vehicle at said preset speed, thereby engaging the system;	<p>2. Depress the accelerator pedal. When the vehicle reaches the desired speed, push the control lever downward and release it. When the system is set to automatic fixed-speed cruise mode, the indicator light on the meter turns on.</p> <p><i>Id.</i></p>

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