

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOYOTA MOTOR NORTH AMERICA, INC., SUBARU OF AMERICA, INC.,  
AMERICAN HONDA MOTOR CO., INC., NISSAN NORTH 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

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CASE IPR: 2014-00280  
Patent 6,324,463

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**PATENT OWNER'S RESPONSE**

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Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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## I. INTRODUCTION

Pursuant to 37 C.F.R. § 42.120, Patent Owner Cruise Control Technologies LLC (“Patent Owner”) submits this response to the Petition for *Inter Partes* Review (“Petition”) of claims 1-5, 12-16, 18, 19, 21, 25-28 and 34-36 of U.S. Patent No. 6,324,463 (the “463 Patent”) filed by Subaru of America, Inc., Toyota Motor North America, Inc., American Honda Motor Co., Inc., Nissan North America Inc., Ford Motor Company, Jaguar Land Rover North America LLC and Volvo Cars of North America LLC (collectively “Petitioner”). Paper 1, p. 1.

On July 2, 2014, the Patent Trial and Appeal Board (“Board”) instituted *inter partes* review based on the following grounds of unpatentability alleged in the Petition:

Ground A: Diamante Owner’s Manual (“Diamante”) anticipates claims 1-3, 5, 12-16, 21, 25, 26 and 28;

Ground B: Diamante in view of Diamante Preview Distance Control Manual (“Preview Distance Control Manual”) render obvious claims 15, 16 and 21;

Ground C: Diamante in view of Japanese Patent Application Publication No. JP8-192663 (“Watanabe”) render obvious claim 12;

Ground D: Watanabe anticipates claims 18 and 19; and

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