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BEFORE THE PATENT TRIAL AND APPEAL BOARD

NISSAN NORTH AMERICA, INC., FORD MOTOR COMPANY, AMERICAN
HONDA MOTOR CO., INC., JAGUAR LAND ROVER NORTH AMERICA
LLC, SUBARU OF AMERICA INC., TOYOTA MOTOR NORTH AMERICA,
INC., AND VOLVO CARS OF NORTH AMERICA LLC,
Petitioners

v.

CRUISE CONTROL TECHNOLOGIES LLC,
Patent Owner

CASE IPR: 2014-00291

**[AMENDED] PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO.
6,324,463 UNDER 35 U.S.C. §§311-319 AND 37 C.F.R. §§ 42.1-.80 & 42.100-.123**

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1).....	3
	A. Real party-in-interest under 37 C.F.R. § 42.8(b)(1).....	3
	B. Related matters under 37 C.F.R. § 42.8(b)(2).....	3
	C. Lead and back-up counsel under 37 C.F.R. § 42.8(b)(3).....	4
	D. Service information under 37 C.F.R. § 42.8(b)(4).....	5
III.	PAYMENT OF FEES	6
IV.	REQUIREMENTS FOR <i>INTER PARTES</i> REVIEW	6
	A. Grounds for standing under 37 C.F.R. § 42.104(a).....	6
	B. Identification of challenge and relief requested	6
	C. How the challenged claims are to be construed under 37 C.F.R. § 42.104(b)(3).....	7
	D. Supporting evidence under 37 C.F.R. § 42.104(b)(5).....	7
V.	BACKGROUND OF THE TECHNOLOGY AND PURPORTED INVENTION OF THE '463 PATENT.....	8
	A. Background of the technology	8
	B. Purported invention of the '463 Patent	10
	C. Summary of the prosecution history of the '463 Patent.....	10
VI.	CLAIM CONSTRUCTION	12
	A. “engaging the system” (claim 1) and “engaging the cruise control system” (claim 21)	12
	B. “enabling” (claims 1 and 2) and “enabled” (claims 2 and 4).....	13
	C. “unset status of the preset speed” (claim 15) and “unset state of the preset speed” (claim 21)	13
	D. “activating the cruise control” (claims 12 and 15) and “deactivated” (claims 12, 13, and 21)	14
VII.	PERSON HAVING ORDINARY SKILL IN THE ART (PHOSITA).....	14
VIII.	HOW THE CHALLENGED CLAIMS ARE UNPATENTABLE UNDER 37 C.F.R. § 42.104(b)	15

A.	Ground 1: Claims 1-3, 5, 12-14, 18-19, 25-27, 29-31, and 34-36 are anticipated under 35 U.S.C. § 102(b) over Prometheus (Ex. 1003).....	15
B.	Ground 2: Claims 3-5, 12, 15-16, 21, and 28 are obvious under § 103(a) over Prometheus (Ex. 1003) in view of Narita (Ex. 1006).....	41
C.	Ground 3: Claim 4 is obvious under § 103(a) over Prometheus (Ex. 1003) in view of Celsior (Ex. 1009).....	53
IX.	CONCLUSION.....	56

LIST OF EXHIBITS

- 1001 U.S. Patent No. 6,324,463 (“the ‘463 Patent”)
- 1002 File History for the ‘463 Patent
- 1003 Prometheus, Autonomous Intelligent Cruise Control (AICC)
 (“Prometheus”)
- 1004 Japanese Published Patent JP 60-174329, Narita, et al.
- 1005 Declaration of David Boldwin certifying Translation of
 Japanese Published Patent JP 60-174329
- 1006 Certified English Translation of Japanese Published Patent JP
 60-174329
- 1007 Toyota, Celsior Owner’s Manual
- 1008 Certificate of Translation of Hiroyuki Sasai, Sunflare Co., Ltd.,
 certifying translation of Celsior Owner’s Manual
- 1009 Certified English Translation of Toyota, Celsior Owner’s
 Manual
- 1010 Declaration of David A. McNamara in Support of Petition for
 Inter Partes Review (“McNamara Declaration”)

Petitioner Nissan North America, Inc., along with its co-petitioners identified below, respectfully request *inter partes* review under 35 U.S.C. § 311 and 37 C.F.R. § 42.100 of claims 1-5, 12-16, 18-19, 21, 25-31, and 34-36 of U.S. Patent No. 6,324,463 (“the ’463 Patent”), titled “Cruise Control Indicator” (Ex. 1001).

I. INTRODUCTION

The ’463 Patent purports to meet a safety driven need to always inform a driver about the present operating state of a cruise control system, in particular by providing a continuous visual indicator of a set vehicle speed. (*See id.* at 2:38-45.) This need, however, was recognized and addressed years earlier in numerous prior art references.

With a traditional needle and dial type of analog speedometer, the prior art “Prometheus” publication made use of a series of LEDs arranged around the periphery of the dial, wherein a set speed was indicated by lighting of the LEDs at the appropriate position on the dial. (*See Prometheus* (Ex. 1003), at pp. 110-111 (Figs. 3-4).) The Prometheus display is shown below next to the LED embodiment of the ’463 Patent.

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