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UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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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

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CASE IPR: Unassigned

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**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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Petition for *Inter Partes* Review of  
U.S. Patent No. 6,324,463

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**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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