

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the *Inter Partes* Review of:

Trial Number: To Be Assigned

U.S. Patent No. 8,217,612

Filed: January 28, 2009

Issued: July 10, 2012

Inventor(s): Mario Boisvert, Randall  
Perrin, John Washeleski

Assignee: UUSI, LLC

Title: Collision Monitoring System

Panel: To Be Assigned

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Mail Stop *Inter Partes* Review  
Commissions for Patents  
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Alexandria, VA 22313-1450

**PETITION FOR *INTER PARTES* REVIEW UNDER 37 C.F.R. § 42.100**

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On behalf of Brose North America, Inc. (“BNA”) and Brose Fahrzeugteile GmbH & Co. KG, Hallstadt (“Brose”) and in accordance with 35 U.S.C. § 311 and 37 C.F.R. § 42.100, *inter partes* review is respectfully requested for claims 1-2 and 5-8 (“the Challenged Claims”) of U.S. Patent No. 8,217,612 (“the ’612 Patent”), attached hereto as Exhibit 1005.

**I. MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(1)**

Pursuant to 37 C.F.R. § 42.8(a)(1), the mandatory notices identified in 37 C.F.R. § 42.8(b) are provided below as part of this Petition.

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

BNA and Brose are the real parties-in-interest for Petitioner.

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

UUSI, LLC (“UUSI”) has asserted the ’612 Patent in two pending lawsuits:

- *UUSI, LLC v. Robert Bosch LLC and Brose North Am., Inc.*, No. 2:13-cv-10444 (E.D. Mich.) (“*UUSI v. BNA*”), filed February 4, 2013, and served on Bosch and BNA on February 7, 2013.
- *UUSI, LLC v. Webasto Roof Sys., Inc.*, No. 2:13-cv-11704 (E.D. Mich.) (“*UUSI v. Webasto*”), filed April 15, 2013, and served April 16, 2013.

**C. 37 C.F.R. § 42.8(b)(3): Lead and Back-Up Counsel and Service Information**

Petitioners provide the following designation of counsel:

Lead Counsel	Back-up Counsel
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Pursuant to 37 C.F.R. § 42.10(b), Powers of Attorney accompany this Petition. Please address all correspondence to lead and back-up counsel at the address above. Petitioners also consent to service by email.

## **II. PAYMENT OF FEES PURSUANT TO 37 C.F.R. § 42.103**

The undersigned authorizes the Office to charge the fee set forth in 37 C.F.R. § 42.15(a) for this Petition to Deposit Account No. 506092. Review of six (6) claims is requested, so no excess claim fees are required. The undersigned further authorizes payment for any additional fees that might be due in connection with this Petition to be charged to the above-referenced Deposit Account.

## **III. GROUNDS FOR STANDING PURSUANT TO 37 C.F.R. § 42.104(A)**

Petitioners certify that the '612 Patent is available for *inter partes* review and that neither is barred nor estopped from requesting *inter partes* review of the Challenged Claims. Petitioners certify that (1) neither is the owner of the '612 Patent; (2) neither BNA nor Brose (or any real party-in-interest) has filed a civil action challenging the validity of any claim of the '612 Patent; (3) this Petition is

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