





U.S. PATENT NO. 7,579,802

CLAIMS	E70	
	<p style="text-align: right;">Page 110</p> <p>1 Q. Right.</p> <p>2 A. So, this was a product that we were working on, but it</p> <p>3 was killed and never went to production. So, this</p> <p>4 document actually is about that.</p> <p>5 Q. So, you can put that aside, based on the testimony you</p> <p>6 just gave.</p> <p>7 For the sensoric systems that you referred to</p> <p>8 earlier when you were answering several questions,</p> <p>9 those systems have hall effect sensors; is that</p> <p>10 correct?</p> <p>11 A. That's correct.</p> <p>12 Q. Is the situation such where they -- strike that.</p> <p>13 Are sensoric systems anti-pinch or are they</p> <p>14 non anti-pinch?</p> <p>15 A. Sensors can be put in a motor for any number of</p> <p>16 reasons. The hall effect sensors, in the case where we</p> <p>17 put them in, are typically used for anti-pinch, yes.</p> <p>18 Q. And so, the electronics portion of that that achieves</p> <p>19 that, is that in a plug-in version, integrated version,</p> <p>20 or external version?</p> <p>21 A. You're asking about the electronics that marries to the</p> <p>22 sensoric motor?</p> <p>23 Q. Correct.</p> <p>24 A. The electronics that marries to a sensoric motor would</p> <p>25 typically be a door control unit, which is completely</p>	<p style="text-align: right;">Page 111</p> <p>1 separate from a window regulator assembly.</p> <p>2 Q. And that door control unit may or may not be provided</p> <p>3 by Brose; is that correct?</p> <p>4 A. That's true.</p> <p>5 Q. Craig likes it when I ask short questions like this. I</p> <p>6 like to ask long ones to get it all out. We'll ask</p> <p>7 short ones too, Craig, don't worry.</p> <p>8 MR. LEAVELL: I like when you ask no</p> <p>9 questions.</p> <p>10 MR. MOUSTAKAS: I know, but it can't go that</p> <p>11 way today.</p> <p>12 MARKED FOR IDENTIFICATION:</p> <p>13 DEPOSITION EXHIBIT 7</p> <p>14 12:18 p.m.</p> <p>15 BY MR. MOUSTAKAS:</p> <p>16 Q. So, we've handed the witness what has been marked as</p> <p>17 Deposition Exhibit Number 7, which is a document</p> <p>18 spanning the Bates Number range 13641 through 13649.</p> <p>19 And the record should reflect that Mr. Brink is</p> <p>20 reviewing the document and will let me know when he is</p> <p>21 finished.</p> <p>22 A. Okay, I'm finished.</p> <p>23 Q. This is a document you recognize?</p> <p>24 A. I recognize it as a Brose document, yes.</p> <p>25 Q. Is this a document you referred to yesterday as part of</p>
<p>a) a sensor for measuring a parameter of a motor coupled to the motor driven element that varies in response to a resistance to motion during all or part of a range of motion of the motor driven element;</p>	<p>Bates Number BROSE-00364391 discloses that platform E70 includes a window lift motor:</p>	

U.S. PATENT NO. 7,579,802

CLAIMS	E70															
	<div style="text-align: right;">  </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> BMW X5 / X6 </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> E70 / 71 Program Overview </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Vehicle Line:</td> <td>X5/X6</td> <td rowspan="7" style="text-align: center; vertical-align: middle;">  <p>BMW X5</p> </td> </tr> <tr> <td>Model Year:</td> <td>2011(Running Change)</td> </tr> <tr> <td>SOP:</td> <td>March 2010</td> </tr> <tr> <td>Program Duration:</td> <td>4 years</td> </tr> <tr> <td>Package Desc:</td> <td>Window Lift Motor</td> </tr> <tr> <td>Brose Mfg Location:</td> <td>Brose Gainesville, Georgia</td> </tr> <tr> <td>Customer Locations:</td> <td>Brose Queretaro, Mexico</td> </tr> </table> <div style="text-align: right; margin-top: 10px;"> 17-Jun-09 </div> <p style="margin-top: 20px;">Bates Number BROSE-00364393 indicates the motor as 1BB26 motor:</p> <p style="margin-top: 10px;">Bates Number BROSE-00371664 discloses that platform E70 includes a 1BB26 motor with part number 927613 and 927614:</p>	Vehicle Line:	X5/X6	 <p>BMW X5</p>	Model Year:	2011(Running Change)	SOP:	March 2010	Program Duration:	4 years	Package Desc:	Window Lift Motor	Brose Mfg Location:	Brose Gainesville, Georgia	Customer Locations:	Brose Queretaro, Mexico
Vehicle Line:	X5/X6	 <p>BMW X5</p>														
Model Year:	2011(Running Change)															
SOP:	March 2010															
Program Duration:	4 years															
Package Desc:	Window Lift Motor															
Brose Mfg Location:	Brose Gainesville, Georgia															
Customer Locations:	Brose Queretaro, Mexico															

U.S. PATENT NO. 7,579,802

CLAIMS

E70

Brose Queretaro		Produktlebenslauf/ Product History	Prozess FMEA/ Process FMEA	N/A	Seite 1 von 1/ Page 1 of 1
Stueck Nr/Part#	927813-101 / 927814-101		Konstruktions FMEA/ DFMEA	N/A	
Kurzbeschr/Name Beschr/Description	E70 Window Lift Motor Drive	Project: E70 (Motor type 1BB26)	Anzahl Termin Freigabe		
Kunde/Customer	Brose		Freigabemuster/ PPAP Submission		
Massbildnr/ Blk Box Dwg#	500-88100 AE		Erstmuster/ First Submission		
Kundenidnr/ Cust ID#	927813-101 / 927814-101		Nullserie/0-Series		
Kd. Zng/Cust Dwg#	727611-114		Serie/Series		

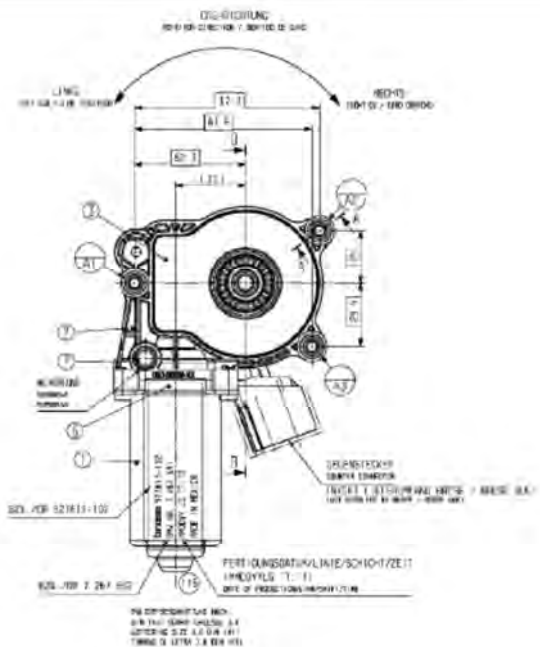
Bates Number BROSE-00220300 discloses the motor for platforms E70 and E71. Specifically, platforms E70 and E71 includes motors with part number 927611, 927612, 927613, and 927314:

brose Technik für Automobile		<small>Versteckter Motor für die Steuerung des Fensterhebermechanismus, verwendet und ist als ein Motor für die Steuerung des Fensterhebermechanismus, der eine geringe Lautstärke erzeugt, verwendet wird. Die Lautstärke wird durch ein Schwingungsnetz, das die Steuerung des Fensterhebermechanismus steuert, geregelt.</small> <small>The design, use, distribution or disclosure of the confidential and proprietary information contained in this document is the exclusive property of Brose Fahrzeugteile. Any unauthorized disclosure of this information to any third party is prohibited. The design, use, distribution or disclosure of this information is prohibited.</small>	
	Maßstab/Scale	Blatt von	Massbild Black box drawing L/70/71 BLACKBOX DRAWING 10.11/08 Date PFI N
SEE TABLE/SIEME TABELLE	Kunden-Nr.	Seite	Material-Nr./material No. / Classen-Nr. s. Tabelle see table 5000 SAP
Kunden-Zeichnungs-Nr.	Kd. Zei	Zeichnungs-Nr./Drawing No.	727611-115 AO

U.S. PATENT NO. 7,579,802



CLAIMS

E70



Material-Nr. material no.	Gewicht weight
927613-102	635 g
927614-102	
927611-102	650 g
927612-102	

U.S. PATENT NO. 7,579,802

CLAIMS	E70
	<div data-bbox="1659 305 1816 365" style="text-align: right;">  </div> <div data-bbox="709 386 1094 440" style="border: 1px solid black; padding: 2px; margin-bottom: 10px;"> <p>BMW X5 / X6</p> </div> <p>Application Information:</p> <div data-bbox="709 532 1808 1019" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <ul style="list-style-type: none"> • BB2635, 14.25Nm Motor • 6-pin Connector • Front / Rear Applications • 7 degree thin toothed armature shaft • Additional ribs added to strengthen gearhousing • Alignment Features • Enhancements to Achieve 14.25Nm: <ul style="list-style-type: none"> - Increased Winding - High Flux Magnet </div> <div data-bbox="1388 537 1808 1019" style="text-align: right; margin: 10px 0;">  </div> <div data-bbox="1654 1057 1766 1089" style="text-align: right; margin-top: 10px;"> <p>17-Jun-09</p> </div> <p style="margin-top: 20px;">Bates Number BROSE-00364391 discloses the motor driven element that moves over a range of motion. Specifically platform E70 includes a vehicle with four windows:</p>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.