

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the *Inter Partes* Review of:

Trial Number: IPR2014-00417

U.S. Patent No. 7,579,802

Filed: January 27, 2004

Issued: August 25, 2009

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

Assignee: UUSI, LLC

Title: Collision Monitoring System

Panel: To Be Assigned

Mail Stop *Inter Partes* Review
Commissions for Patents
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CORRECTED PETITION FOR *INTER PARTES* REVIEW
UNDER 37 C.F.R. § 42.100

TABLE OF CONTENTS

I.	MANDATORY NOTICES PURSUANT TO 37 C.F.R. § 42.8(a)(1).....	1
A.	37 C.F.R. § 42.8(b)(1): Real Party-In-Interest.....	1
B.	37 C.F.R. § 42.8(b)(2): Related Matters	1
C.	37 C.F.R. § 42.8(b)(3): Lead and Back-Up Counsel and Service Information.....	1
II.	PAYMENT OF FEES PURSUANT TO 37 C.F.R. § 42.103	2
III.	GROUND(S) FOR STANDING PURSUANT TO 37 C.F.R. § 42.104(a).....	2
IV.	IDENTIFICATION OF CHALLENGE PURSUANT TO 37 C.F.R. § 42.104(b).....	3
A.	37 C.F.R. § 42.104(b)(1): Claims for Which <i>Inter Partes</i> Review Is Requested	3
B.	37 C.F.R. § 42.104(b)(2): The Specific Art and Statutory Ground(s) on Which the Challenge Is Based.....	3
C.	37 C.F.R. § 42.104(b)(3): How the Challenged Claims Are to Be Construed	4
1.	“a controller . . . for determining to de-activate the motor” (claim 1); “a signal . . . for stopping the motor” (claim 7); and “de-activating the motor” (claim 14)	5
2.	“a movement sensor for monitoring movement of the object (claim 7) and “a sensor for sensing movement of a window or panel” (claim 14)	6
D.	37 C.F.R. § 42.104(b)(4): How the Construed Claims are Unpatentable Under the Statutory Grounds Identified	8
E.	37 C.F.R. § 42.104(b)(5): Evidence Supporting Petitioner’s Challenge.....	8
V.	THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE OF THE CHALLENGED CLAIMS IS UNPATENTABLE.....	8

A.	Description of the Alleged Invention of the '802 Patent	8
B.	Summary of the Prosecution History of the '802 Patent	10
C.	Summary of Invalidity Arguments.....	14
1.	Summary of Itoh	14
2.	Summary of Kinzl.....	23
D.	Identification of the References as Prior Art.....	27
E.	Claim-By-Claim Explanation of Grounds for Unpatentability and Claim Charts	27
	Ground 1: Claims 1, 6-9, and 14 are Obvious under 35 U.S.C. § 103(a) over Itoh in View of the Ordinary Skill in the Art.	28
	Ground 2: Under the Apparent Constructions Advocated by UUSI, Claims 1, 6-9, and 14 are Anticipated by Itoh.....	39
	Ground 3: Claims 7, 9, and 14 are Anticipated by Kinzl.....	40
	Ground 4: Claims 7, 9, and 14 are Obvious under 35 U.S.C. § 103(a) over Kinzl in View of the Ordinary Skill in the Art	49
	Ground 5: Claims 1, 6-9, and 14 are Obvious under 35 U.S.C. § 103(a) over Itoh in View of the Ordinary Skill in the Art and Kinzl.....	49
	Ground 6: Claims 7-9 and 14 are Obvious under 35 U.S.C. § 103(a) over Itoh in View of the Ordinary Skill in the Art and Zuckerman.	56
	Ground 7: Claims 7-9 and 14 are Obvious under 35 U.S.C. § 103(a) over Itoh in View of the Ordinary Skill in the Art, Kinzl, and Zuckerman.	57
VI.	CONCLUSION.....	59

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, 6-9, and 14 (“the Challenged Claims”) of U.S. Patent No. 7,579,802 (“the ’802 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 ’802 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

Brose provides 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 '802 Patent is available for *inter partes* review and that neither is barred nor estopped from requesting *inter partes* review of the Challenged Claims on the grounds identified herein. Specifically, Petitioners certify that (1) neither is the owner of the '802 Patent; (2) neither BNA nor Brose (or any real party-in-interest) has filed a civil action challenging the validity of any

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