

Filed on behalf of UUSI, LLC

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BROSE NORTH AMERICA, INC.

and

BROSE FAHRZEUGTEILE GMBH & CO. KG, HALLSTADT

Petitioner

v.

UUSI, LLC

Patent Owner

Case IPR2014-00417

Patent 7,579,802

PATENT OWNER RESPONSE

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I. INTRODUCTION

A. BACKGROUND OF PATENT OWNER

Patent owner, UUSI, LLC, dba Nartron Corporation, was founded in 1967 and is based in Reed City, Michigan. Nartron designs, develops, manufactures, and markets electronic systems and components for automotive, truck, military, and consumer product markets. Nartron is a privately owned company with more than one hundred employees at its Michigan manufacturing plant.

Nartron invented the safety technology described in U.S. Patent No. 8,214,612 (the '612 Patent) and U.S. Patent No. 7,579,802 (the '802 Patent), which is included in a motor controller it sold to Webasto Roof Systems Inc. After Webasto stopped purchasing this controller from Nartron, Nartron sued Webasto (a Petitioner in pending IPRs 2014-00648, 2014-00649, and 2014-00650) in addition to the present Petitioner Brose for infringement of the '612 and '802 Patents. Photos of this controller are shown in Exhibit 2008. Photographs of the Brose/Bosch motor and controller incorporating Nartron's patented technology are shown in Exhibit 2009.

B. STATE OF THE ART

Manually cranked window lift mechanisms were being replaced by electric motor driven window lift mechanisms in the 1980s. Expert Declaration in Support

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