

DOCKET NO.: 0110198-00193 US1
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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

THE GILLETTE COMPANY
Petitioner

v.

Patent Owner of
U.S. Patent No. 6,896,775 to Roman Chistyakov

IPR Trial No. TBD

**PETITION FOR *INTER PARTES* REVIEW OF
U.S. PATENT NO. 6,896,775
UNDER 35 U.S.C. § 312 AND 37 C.F.R. § 42.104**

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TABLE OF AUTHORITIES

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FEDERAL CASES

In re ICON Health & Fitness, Inc., 496 F.3d 1374, 1379 (Fed. Cir. 2007)5
In re Yamamoto, 740 F.2d 1569, 1571-72 (Fed. Cir. 1984)4,5

FEDERAL STATUTES

35 U.S.C. § 102(a)4
35 U.S.C. § 102(b)3
35 U.S.C. § 102(e)3
35 U.S.C. §1034
35 U.S.C. § 314(a)4

RULES

Rule 42.104(b)(1)-(2)2
Rule 42.104(b)(4)-(5)14
Rule 42.104(a)2
Rule 42.22(a)(1)2

REGULATIONS

37 C.F.R. § 42.100(b)4,5
77 Fed. Reg. 48756, 48764 (Aug. 14, 2012)5

I. MANDATORY NOTICES

A. Real Party-in-Interest

The Gillette Company (“Petitioner”), a wholly-owned subsidiary of the Procter & Gamble Co., is the real party-in-interest.

B. Related Matters

Zond, Inc. v. The Gillette Co. and The Procter and Gamble Co., Civil Action No. 1:13-CV. 11567-DJC (D. Mass. 2013) would affect or be affected by a decision in the proceeding. Additionally, the Patent Owner is suing various parties under one or more of U.S. Patent Nos. 8,125,155, 7,147,759; 6,896,775; 6,853,142; 7,604,716; 6,896,773; 7,811,421; 6,805,779; 7,808,184; and 6,806,652, all of which have generally similar subject matter. A separate *Inter Partes* review petition is being filed to address claims 30-37 of the ‘775 Patent. Additionally, the Petitioner previously filed two petitions related to the United States Patent No. 8,125,155 (IPR Nos. 2014-00477 and 2014-00479) and is filing additional petitions for Inter Partes Review for U.S. Patent No. 6,896,773.

C. Counsel

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II. CERTIFICATION OF GROUNDS FOR STANDING

Petitioner certifies pursuant to Rule 42.104(a) that the patent for which review is sought is available for *inter partes* review and that Petitioner is not barred or estopped from requesting an *inter partes* review challenging the patent claims on the grounds identified in this Petition.

III. OVERVIEW OF CHALLENGE AND RELIEF REQUESTED

Pursuant to Rules 42.22(a)(1) and 42.104(b)(1)-(2), Petitioner challenges claims 1-29 of U.S. Patent No. 6,896,775 (the '775 Patent) (Ex. 1001).

A. Prior Art Patents and Printed Publications

The following references and others in the Table of Exhibits are pertinent to the grounds of unpatentability explained below:

1. D.V. Mozgrin, *et al.*, High-Current Low-Pressure Quasi-Stationary Discharge in a Magnetic Field: Experimental Research, Plasma Physics Reports, Vol. 21, No. 5, 1995 (“Mozgrin” (Ex. 1002)), which is prior art under §102(b).

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