Filed on behalf of UUSI, LLC

By: Monte L. Falcoff (mlfalcoff@hdp.com)
Hemant M. Keskar (hkeskar@hdp.com)
HARNESS, DICKEY & PIERCE, P.L.C.
5445 Corporate Drive, Ste. 200
Troy, MI 48098
Telephone: (248) 641-1600
Facsimile: (248) 641-0270

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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WEBASTO ROOF SYSTEMS, INC.
Petitioner

v.

UUSI, LLC
Patent Owner

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Case IPR2014-00650
Patent 7,579,802

PATENT OWNER'S 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. 8,217,612 (the '612 Patent), U.S. Patent No. 7,579,802 (the '802 Patent), and U.S. Patent No. 7,548,037 (the '037 Patent), which was included in a motor controller it sold to Webasto Roof Systems Inc. After Webasto stopped purchasing this controller from Nartron, Nartron sued Webasto, the present Petitioner in the pending IPRs 2014-00648, 2014-00649, and 2014-00650 for infringement of the '612, '037, and '802 Patents. Additionally, Nartron sued Brose, another Petitioner in the pending IPRs 2014-00416 and 2014-00417 for infringement of the '612 and '802 Patents. Photographs of this Nartron-Webasto controller are shown in Exhibit 20013. Photographs of the Brose/Bosch motor and their controller incorporating Nartron's patented technology are shown in Exhibit 2014.

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