

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEBASTO ROOF SYSTEMS, INC.
Petitioner,

v.

UUSI, LLC
Patent Owner.

Case IPR2014-_____
Patent 7,579,802

**PETITION FOR INTER PARTES REVIEW
PURSUANT TO 35 U.S.C. §§ 311–319 AND 37 C.F.R. § 42**

Attorney Docket: 130163.231151

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Petitioner Webasto Roof Systems, Inc. (“WRSI”) requests *inter partes* review (“IPR”) of claims 1, 6-9, 11 and 15-16 of U.S. Patent No. 7,579,802 (“the ’802 Patent”) (Ex. 1001). This Petition shows that there is a reasonable likelihood that these claims are unpatentable. Petitioner requests that the claims be declared unpatentable and canceled.

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8

Real party-in-interest: Webasto Roof Systems, Inc.

Related matters: The following matters involving the ’802 Patent would affect, or be affected by, a decision in the proceeding: *UUSI, LLC v. Webasto Roof Sys., Inc.*, No. 2:13-cv-11704 (E.D. Mich.); *UUSI, LLC v. Robert Bosch LLC and Brose North Am., Inc.*, No. 2:13-cv-10444 (E.D. Mich.); *Brose North Am., Inc. and Brose Fahrzeugteile GmbH & Co. KG, Hallstadt v. UUSI, LLC*, IPR2014-00417.¹

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¹ The only overlap between this petition and the petition in IPR2014-00417 is that both assert obviousness of claims 1 and 6-9 based on Itoh in view of Kinzl. This petition also asserts invalidity of claims 15-16 based on this combination and asserts other grounds of invalidity against all these claims and claim 11.

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Counsel consents to electronic service at their email addresses. A power of attorney accompanies this Petition.

II. PAYMENT OF FEES

We hereby authorize the Office to charge the fee set forth in 37 C.F.R. § 42.15(a) for this Petition to a credit card, and further authorize payment of any additional fees to be charged to Deposit Account No. 50-4494.

III. REQUIREMENTS UNDER 37 C.F.R. § 42.104

A. Grounds for Standing Under 37 C.F.R. § 42.104(a)

WRSI certifies that the '802 Patent is available for IPR and that WRSI is not barred or estopped from requesting this IPR.

B. Identification of Challenge Under 37 C.F.R. § 42.104(b)

WRSI requests IPR of claims 1, 6-9, 11, and 15-16 of the '802 Patent based on the following prior art references. An Appendix of Exhibits is attached.

Section VI below sets forth, per 37 C.F.R. § 42.104(b)(2), the grounds under 35

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