

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TRW AUTOMOTIVE U.S. LLC

Petitioner

v.

MAGNA ELECTRONICS, INC.

Patent Owner

Case IPR2015-00 _____
Patent 8,599,001

PETITION FOR *INTER PARTES* REVIEW

Respectfully submitted,

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I. Introduction and Exhibits

Petitioner seeks *inter partes* review to invalidate certain claims of U.S. Pat. No. 8,599,001 titled “VEHICULAR VISION SYSTEM,” which issued Dec. 3, 2013 and has not yet expired. A copy of the ‘001 Patent is attached as Ex. 1302.¹ The technology at issue pertains to a CMOS photosensor array positioned behind a windshield of an equipped vehicle. (1302-001 at Abstract).² The ‘001 Patent was filed Nov. 19, 2012, and claims priority ultimately to U.S. Pat. No. 5,877,897, filed June 7, 1995.³

II. Threshold Issues

II.A. Challenge/relief request – Rules 42.22(a)(1) and 42.104(b)(1)-(2)

Petitioner requests *inter partes* review and invalidation of claims 11-14 and 96-109 of the ‘001 Patent. The bases for this request are summarized in the table below. References to statutes are pre-AIA.

¹ A full listing of all exhibits, per Rule 42.63(e) is provided as Exhibit 1301.

² The discussion below identifies exhibits by name, together with page numbers that have been added to expedite review. The citations have as a format “XXXX-YYY” where XXXX is the exhibit number and YYY is the sequential page number of that document. Such information as column number, line number, and paragraph number are further provided as appropriate.

³ This petition assumes that the ‘001 Patent is entitled to the June 7, 1995 priority date, as entitlement to that date is not believed to affect the outcome in this proceeding. Petitioner does not admit entitlement to June 7, 1995.

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