

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,

Petitioner,

v.

SIGNAL IP, INC.,

Patent Owner.

Case IPR2015-01088

Patent 5,954,775

PATENT OWNER'S UPDATED MANDATORY NOTICES

37 C.F.R. § 42.8(a)(2)

Pursuant to 37 C.F.R. § 42.8(a)(2) Patent Owner updates its mandatory notices as follows:

(2) Related matters.

U.S. Patent No. 5,954,775 is at issue in the following pending litigation:

- *Signal IP, Inc. v. Mercedes-Benz USA, LLC et al.*, 2-14-cv-03109 (CACD);
- *Signal IP, Inc. v. BMW of North America, LLC et al.*, 2-14-cv-03111 (CACD); and
- *Signal IP, Inc. v. Volkswagen Group of America, Inc. d/b/a Audi of America, Inc. et al.*, 2-14-cv-03113 (CACD).

On April 17, 2015, the U.S. District Court for the Central District of California entered an Order re Claims Construction regarding U.S. Patents 5,714,927; 5,732,375; 6,012,007; 6,434,486; 6,775,601; 5,463,374; and 5,954,775, at issue in the above-noted litigations. A copy of the Court's Order re Claim Construction is provided as Ex. 2001.

On May 20, 2015, various parties to the above-noted litigations entered into a stipulation for entry of a partial final judgment. Pursuant to the stipulation, Ex. 2002,

In light of the Court's claim construction order, Plaintiff and Defendants stipulate to entry of a partial final

judgment that the following claims are invalid due to indefiniteness under 35 U.S.C. § 112, paragraph 2: (i) claims 8, 9, 10, 11, 13, 15, and 17 of the '601 patent; (ii) claims 1 and 7 of the '375 patent; and (iii) claims 1, 8, 9, 17, 18, 19, and 20 of the '007 patent.

Plaintiff and Defendants reserve all appellate rights, including, but not limited to, the right to appeal the Court's April 17, 2015 claim construction order to the United States Court of Appeals for the Federal Circuit. Plaintiff reserves all rights as to claims not addressed by the Court's claim construction order, or any new claims that may be issued by the United States Patent Office.

On May 22, 2015, pursuant to the above-referenced stipulation, the U.S. District Court for the Central District of California entered a Partial Judgment of Invalidity, Ex. 2003, that:

1. Claims 8, 9, 10, 11, 13, 15, and 17 of U.S. Patent No. 6,775,601 ("the '601 patent") are invalid as indefinite under 35 U.S.C. § 112, paragraph 2.
2. Claims 1 and 7 of U.S. Patent No. 5,732,375 ("the

'375 patent") are invalid as indefinite under 35 U.S.C. § 112, paragraph 2.

3. Claims 1, 8, 9, 17, 18, 19, and 20 of U.S. Patent No. 6,012,007 ("the '007 patent") are invalid as indefinite under 35 U.S.C. § 112, paragraph 2.

Respectfully submitted,

Dated: September 3, 2015

/Tarek N. Fahmi/

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EXHIBIT LIST

Exhibit No.	Description
2001	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, ORDER RE CLAIM CONSTRUCTION, Case Nos. 2:14-cv-02454-JAK et al., April 17, 2015.
2002	JOINT STIPULATION FOR ENTRY OF PARTIAL FINAL JUDGMENT OF INVALIDITY, Case Nos. 2:14-cv-02454-JAK et al., May 20, 2015.
2003	UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, PARTIAL JUDGMENT OF INVALIDITY Case Nos. 2:14-cv-02454-JAK et al., May 22, 2015.

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