

Paper No. ____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Kia Motors America, Inc.
Petitioner,

v.

Signal IP, Inc.
Patent Owner.

Patent No. 6,012,007

Issued: January 4, 2000

Filed: June 3, 1997

Inventors: Duane Donald Fortune, Robert John Cashler

Title: OCCUPANT DETECTION METHOD AND APPARATUS FOR AIR
BAG SYSTEMS

Inter Partes Review No. _____

PETITION FOR *INTER PARTES* REVIEW

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EXHIBITS

Exhibit-1001	U.S. Patent No. 6,012,007 to Fortune et al. (“the ’007 Patent”)
Exhibit-1002	Excerpts from the Prosecution History of the ’007 Patent (“the Prosecution History”)
Exhibit-1003	Declaration of Dr. Kirsten M. Carr re the ’007 Patent
Exhibit-1004	U.S. Patent No. 5,474,327 (“Schousek”)
Exhibit-1005	U.S. Patent No. 5,232,243 (“Blackburn”)
Exhibit-1006	Joint Claim Construction Brief , <i>Signal IP v. Kia Motors America, Inc.</i> , Case LA CV14-02457 Document 73 (Joint Claim Construction Brief)

Kia Motors America, Inc. (“KMA” or “Petitioner”) petitions for *Inter Partes* Review (“IPR”) under 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42 of claims 1-3, 5, 9, and 17-21 (“the Challenged Claims”) of U.S. Patent No. 6,012,007 (“the ’007 Patent”) based on the substantively identical grounds as instituted for the pending IPR proceeding, IPR2015-01004. For the exact same reasons previously considered by the Board, on the exact same trial schedule, Petitioner respectfully seeks to join IPR2015-01004.

In this Petition, Petitioner asserts substantively identical arguments that the Board has already instituted in IPR2015-01004. This Petition does not add to or alter any argument that has already been considered by the Board, and this Petition does not seek to expand the grounds of unpatentability that the Board has already instituted. Accordingly, and as explained below, there exists a reasonable likelihood that Petitioner will prevail in demonstrating unpatentability of at least one of the Challenged Claims based on teachings set forth in the references presented in this Petition.

Because this Petition is filed within one month of the institution of IPR2015-01004, and because this Petition is accompanied by a Motion for Joinder, this Petition is timely and proper under 35 U.S.C. § 315(c).

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