

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BMW OF NORTH AMERICA, LLC,
Petitioner

v.

ADAPTIVE HEADLAMP TECHNOLOGIES, INC.
Patent Owner

Case IPR2016-00196
Patent 7,241,034

**PATENT OWNER'S MANDATORY NOTICES
UNDER 37 C.F.R. § 42.8**

**ADAPTIVE HEADLAMP TECHNOLOGIES, INC.'S MANDATORY
NOTICES UNDER 37 C.F.R. § 42.8**

Pursuant to 37 C.F.R. § 42.8, the Patent Owner submits the following Mandatory Notices in response to the Petition for *Inter Partes* Review Under 37 C.F.R. § 42.100.

1. Real Party-In-Interest (37 C.F.R. § 42.8(b)(1))

Adaptive Headlamp Technologies, Inc. is the owner by assignment of all substantial interests in U.S. Patent No. 7,241,034 B2 (“the ‘034 patent”). Adaptive Headlamp Technologies, Inc. is a wholly owned subsidiary of Wi-LAN Technologies, Inc. which is a wholly owned subsidiary of Wi-LAN, Inc., a publicly traded company.

2. Related Matters (37 C.F.R. § 42.8(b)(2))

The following judicial matters, in which the ‘034 patent is at issue, may affect or be affected by a decision in this proceeding:

(a) *Adaptive Headlamp Technologies, Inc. v. BMW of North America, LLC*, Civil Action No. 1:14cv00962, pending in the District of Delaware.

(b) *Adaptive Headlamp Technologies, Inc. v. FCA US LLC (“Chrysler”), Maserati North America, Inc. & Fiat Chrysler Automobiles N.V.*, Civil Action No. 1:15cv00073, pending in the District of Delaware.

(c) *Adaptive Headlamp Technologies, Inc. v. General Motors LLC*, Civil Action No. 1:15cv00781, pending in the District of Delaware.

(d) *Adaptive Headlamp Technologies, Inc. v. Hyundai Motor America*, Civil Action No. 1:15cv00563, pending in the District of Delaware.

(e) *Adaptive Headlamp Technologies, Inc. v. Mazda Motor of North America, Inc.*, Civil Action No. 1:15cv00782, pending in the District of Delaware.

(f) *Adaptive Headlamp Technologies, Inc. v. Mercedes-Benz USA LLC*, Civil Action No. 1:15cv00075, pending in the District of Delaware.

(g) *Adaptive Headlamp Technologies, Inc. v. Nissan North America Inc.*, Civil Action No. 1:15cv00074, pending in the District of Delaware.

(h) *Adaptive Headlamp Technologies, Inc. v. Toyota Motor Sales, U.S.A., Inc.*, Civil Action No. 1:15cv00779, pending in the District of Delaware; and

(i) *Adaptive Headlamp Technologies, Inc. v. Volvo Cars of North America, LLC*, Civil Action No. 1:15cv00780, pending in the District of Delaware.

3. Lead and Back-Up Counsel (37 C.F.R. § 42.8(b)(3))

Pursuant to 37 C.F.R. §§ 42.8(b)(3) and 42.10(a), Patent Owner provides the following designation of counsel:

Case IPR2016-00196
Patent 7,241,034

Lead Counsel:

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Pursuant to 37 C.F.R. § 42.10(b), Power of Attorneys for lead and back-up counsel are filed herewith.

A motion seeking *pro hac vice* admission for back-up counsel David A. Skeels pursuant to 37 C.F.R. § 42.10(c) is filed herewith.

4. Service Information (37 C.F.R. § 42.8(b)(4))

Patent Owner consents to email service for the respective lead or back-up counsel designated above, with courtesy copies to hermesch@fsclaw.com, klein@fsclaw.com, putnam@fsclaw.com, and dunn@fsclaw.com. Telephone and facsimile numbers for lead and back-up counsel are designated above.

5. Payment of Fees under 37 C.F.R. § 42.103

The undersigned authorizes the U.S. Patent and Trademark Office to charge any applicable fees associated with this proceeding to Deposit Account No. 50-6282.

Dated: December 9, 2015

Respectfully submitted,

By: /Brett M. Pinkus/

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