

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOYOTA MOTOR CORPORATION,

Petitioner,

v.

SIGNAL IP, INC.,

Patent Owner.

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Case IPR2016-00291

Patent 5,732,375

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PATENT OWNER'S MANDATORY NOTICES

37 C.F.R. § 42.8(a)(2)

Pursuant to 37 C.F.R. § 42.8(a)(2) Patent Owner submits the following mandatory notices:

**(1) Real party-in-interest.**

The real party-in-interest is Signal IP, Inc., a California corporation, with a place of business at 11100 Santa Monica Blvd. Suite 380, Los Angeles, CA 90025.

**(2) Related matters.**

U.S. Patent No. 5,732,375 is at issue in the following pending litigation:

- *Signal IP, Inc. v Toyota Motor Sales, USA, Inc., et al.*, 2-15-cv-05162 (CACD);
- *Signal IP, Inc. v. Ford Motor Company*, 2-14-cv-13729 (MIED);
- *Signal IP, Inc. v. Fiat USA, Inc. et al.*, 2-14-cv-13864 (MIED);
- *Signal IP, Inc. v. BMW of North America, LLC et al.*, 2-14-cv-03111 (CACD);
- *Signal IP, Inc. v. Volkswagen Group of America, Inc. d/b/a Audi of America, Inc. et al.*, 2-14-cv-03113 (CACD);
- *Signal IP, Inc. v. Subaru of America, Inc.*, 2-14-cv-02963 (CACD);
- *Signal IP, Inc. v. Nissan North America, Inc.*, 2-14-cv-02962 (CACD);
- *Signal IP, Inc. v. Kia Motors America, Inc.*, 2-14-cv-02457 (CACD);
- *Signal IP, Inc. v. American Honda Motor Co., Inc. et al.*, 2-14-cv-

- 02454 (CACD);
- *Signal IP, Inc. v. Mitsubishi Motors North America, Inc.*, Case No. 8-14-cv-00497 (CACD); and
  - *Signal IP, Inc. v. Mazda Motor of America, Inc.*, Case No 8-14-cv-00491 (CACD).

On April 17, 2015, the U.S. District Court for the Central District of California entered an Order re Claims Construction regarding, *inter alia*, U.S. Patent 5,732,375.

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,

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: . . .

(ii) claims 1 and 7 of the '375 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. 3001, that, *inter alia*, claims 1 and 7 of U.S. Patent No. 5,732,375 are invalid as indefinite under 35 U.S.C. § 112, paragraph 2.

U.S. Patent No. 5,732,375 was also at issue in Reexamination Control No. 90/013,386. Reexamination certificate US 5,732,375 C1 issued Jul. 30, 2015.

U.S. Patent No. 5,732,375 was also at issue in IPR2015-01003, not instituted.

**(3) Lead and back-up counsel.**

Lead Counsel: Tarek N. Fahmi (Reg. No. 41,402)  
Ascenda Law Group, PC  
333 W San Carlos St., Suite 200  
San Jose, CA 95110  
Tel: 866-877-4883  
Email: tarek.fahmi@ascendalaw.com

Back-up Counsel: Holly J. Atkinson (Reg. No. 69,934)

Ascenda Law Group, PC

333 W San Carlos St., Suite 200

San Jose, CA 95110

Tel: 866-877-4883

email: holly.atkinson@ascendalaw.com

Back-up Counsel: Jason A. LaBerteaux (Reg. No. 65,724)

Ascenda Law Group, PC

333 W San Carlos St., Suite 200

San Jose, CA 95110

Tel: 866-877-4883

email: jason.laberteaux@ascendalaw.com

**(4) Address for Service.**

Ascenda Law Group, PC

333 W San Carlos St., Suite 200

San Jose, CA 95110

Tel: 866-877-4883

Fax: 408-773-6177

Email: patents@ascendalaw.com

Patent Owner consents to service by email at the above address.

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