

REQUEST FOR INTER PARTES REVIEW

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of

Docket No: PR00065

Robert John Cashler

Issued: March 24, 1998

U.S. Patent No. 5,732,375

Application No. 08/566,029

Filing Date: December 1, 1995

For: METHOD OF INHIBITING OR ALLOWING AIRBAG DEPLOYMENT

**REQUEST FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 5,732,375 UNDER 35 U.S.C. §§311-319, 37 C.F.R. § 42**

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Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. § 42, Petitioner Aisin Seiki Co., Ltd. (“Aisin Seiki” or “Petitioner”) respectfully request *Inter Partes* Review of claim 11 U.S. Patent No. 5,732,375 (Ex. 1001, “the ‘375 patent”), which was filed on December 1, 1995, and issued on March 4, 1998, to Robert John Cashler and is currently assigned to Signal IP, Inc. (“Patent Owner”) according to the US Patent and Trademark Office assignment records. There is a reasonable likelihood that Petitioner will prevail with respect to at least one of the claims challenged in this Petition.

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EXHIBITS

Exhibit	Description
1001	U.S. Patent No. 5,732,375 to Cashler
1002	U.S. Patent No. 5,474,327 to Schousek
1003	Japanese Unexamined Utility Model Patent Application Publication JP 06-022939 to Tokuyama et al.
1004	English translation of Tokuyama et al. and declaration
1005	Excerpts from File History of U.S. Patent No. 5,732,375 to Cashler
1006	Decision Denying Institution in Case IPR2015-01003
1007	Order RE Claim Construction from <i>Signal IP v. American Honda Motor Co., Inc.</i> , No. 2:14-cv-02454 (C.D. Cal.)
1008	Joint Claim Construction and Prehearing Statement from <i>Signal IP v. American Honda Motor Co., Inc.</i> , No. 2:14- cv-02454 (C.D. Cal.)
1009	Expert Declaration of Dr. Stephen W. Rouhana
1010	Excerpt from File History of Ex. Parte Reex. No. 90/013,386
1011	U.S. Patent No. 5,454,591 to Mazur et al.
1012	U.S. Patent No. 5,232,243 to Blackburn et al.
1013	U.S. Patent No. 5,612,876 to Zeidler et al.
1014	M. Morris Mano, <i>Digital Logic and Computer Design</i> , Prentice Hall, Inc., 1979

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)

A. REAL PARTY-IN-INTEREST UNDER 37 C.F.R. § 42.8(b)(1)

The following is a list of Petitioners (and additional real parties-in-interest for each party in parentheses): Aisin Seiki Co., Ltd..

B. RELATED MATTERS UNDER 37 C.F.R. § 42.8(b)(2)

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioners state that the '375 patent is currently the subject of the following on-going litigations: *Signal IP, Inc. v. Toyota Motor North America, Inc. et al.*, No. 2:15-cv-05162 (C.D. Cal.); *Signal IP, Inc. v. Ford Motor Co.*, No. 2:14-cv-13729 (E.D. Mich.); and *Signal IP, Inc. v. Fiat U.S.A. Inc, et al.*, No. 2:14-cv-13864 (E.D. Mich.). The '375 patent was previously the subject of the following on-going litigations. In each of these cases, the Court entered a partial judgment of invalidity in connection with claims 1 and 7 of the '375 patent on May 22, 2015, holding those claims to be invalid as indefinite. This had the effect of removing the '375 patent from each of the cases pending appeal: *Signal IP, Inc. v. American Honda Motor Co., Inc. et al.*, No. 2:14-cv-02454 (C.D. Cal.); *Signal IP, Inc. v. Kia Motors America, Inc.*, No. 2:14-cv-02457 (C.D. Cal.); *Signal IP, Inc. v. Mazda Motor of America, Inc.*, No. 8:14-cv-00491 (C.D. Cal.); *Signal IP, Inc. v. Mitsubishi Motors North America, Inc.*, No. 8:14-cv-00497 (C.D. Cal.); *Signal IP, Inc. v. Nissan North America, Inc.*, No. 2:14-cv-02962 (C.D.

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