

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MERCEDES-BENZ USA, LLC

Petitioner

v.

ADAPTIVE HEADLAMP TECHNOLOGIES, INC.

Patent Owner

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Case IPR2016-00501

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 *Inter Partes* Review proceedings, in which the ‘034 patent is the sole patent at issue, may affect or be affected by a decision in this proceeding:

(a) *Koito Manufacturing Co., Ltd. v. Adaptive Headlamp Technologies, Inc.*, Case IPR2016-00079;

(b) *BMW of North America, LLC v. Adaptive Headlamp Technologies, Inc.*, Case IPR2016-00196; and

(c) *v. Adaptive Headlamp Technologies, Inc.*, Case IPR2016-00193.

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:

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 Jonathan T. Suder 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 [IPR@fsclaw.com](mailto:IPR@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: February 23, 2016.

Respectfully submitted,

By: /Brett M. Pinkus/

Brett M. Pinkus  
Registration No. 59,980

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