

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,

v.

VERSATA SOFTWARE, INC.
Patent Owner.

U.S. Patent No. 7,882,057 to Little et al.

IPR Case No.: 2016-01013

**PETITION FOR *INTER PARTES* REVIEW
UNDER 35 U.S.C. § 311 *ET SEQ.* AND 37 C.F.R. § 42.100 *ET SEQ.*
(CLAIMS 17, 30, AND 44-46 OF U.S. PATENT NO. 7,882,057)**

Table of Contents

List of Exhibits..... ii

Mandatory Notices Under 37 C.F.R. § 42.8v

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

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

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

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

I. Standing Requirements under 37 C.F.R. § 42.104 1

 A. Grounds for Standing – 37 C.F.R. § 42.104(a)1

 B. Challenged Claims – 37 C.F.R. § 42.104(b)(1)1

 C. Grounds of Challenge – 37 C.F.R. § 42.104(b)(2)1

II. Introduction.....2

III. Overview of the '057 Patent.....2

IV. Person having ordinary skill in the art (PHOSITA)3

V. Claim Construction – 37 C.F.R. § 42.104(b)(3).....4

VI. Unpatentability Grounds.....6

 A. Ground 1 - Claims 17, 30, and 44-46 are obvious in view of
 Loomans, Stahl, and the general knowledge of a PHOSITA6

 1. Reasons to combine Loomans with Stahl6

 2. Claims 17, 30, and 4411

 3. Claim 4541

 4. Claim 4668

Certificate of Service71

Certificate of Compliance Pursuant to 37 C.F.R. § 42.2472

List of Exhibits

Exhibit No.	Description	Date	Identifier
1101	U.S. Patent No. 7,882,057	Feb. 1, 2011	'057 Patent
1102	Expert Declaration of Dr. Philip Greenspun	n/a	Greenspun Decl.
1103	Curriculum Vitae of Dr. Philip Greenspun	n/a	Greenspun CV
1104	U.S. Patent No. 7,882,057 File History	n/a	'057 Patent File History
1105	U.S. Patent No. 7,873,503 to Loomans et al.	Jan. 18, 2011	Loomans
1106	A. Stahl, R. Bergmann, S. Schmitt, <u>A Customization Approach for Structured Products in Electronic Shops</u> , <i>Electronic Commerce: The End of the Beginning, 13th International Bled Electronic Commerce Conference</i> (June 19-21, 2000)	Jun. 2000	Stahl
1107	Alexander Kott, Gerald Agin, David Fawcett, <u>Configuration Tree Solver: A Technology for Automated Design and Configuration</u> , <i>ASME Journal of Mechanical Design</i> 114(1): 187-195 (1992)	1992	Kott
1108	L. Anselma, D. Magro, and P. Torasso, <u>Automatically Decomposing Configuration Problems</u> , <i>AI*IA 2003: Advances in Artificial Intelligence</i> , Lecture Notes in Computer Science, Volume 2829, pp. 39-52 (2003)	2003	Anselma

Exhibit No.	Description	Date	Identifier
1109	D. Magro and P. Torasso, <u>Decomposing and Distributing Configuration Problems</u> , <i>Artificial Intelligence: Methodology, Systems, and Applications</i> , Lecture Notes in Computer Science, Volume 2443, pp. 81-90 (2002)	2002	Magro
1110	Judith Bachant, John McDermott, <u>R1 Revisited: Four Years in the Trenches</u> , <i>AI Magazine</i> Volume 5, Number 3 (1984)	1984	Bachant
1111	John McDermott, <u>R1: A Rule-Based Configurer of Computer Systems</u> , <i>Artificial Intelligence</i> (1982)	1982	McDermott
1112	Bryan M. Kramer, <u>Knowledge-Based Configuration of Computer Systems Using Hierarchical Partial Choice</u> , <i>IEEE</i> (1991)	1991	Kramer
1113	Bei Yu and Hans Jorgen Skovgaard, <u>A Configuration Tool to Increase Product Competitiveness</u> , <i>IEEE Intelligent Systems</i> , 34-41 (July/August 1998)	1998	Yu
1114	U.S. Patent Application Publication No. 2003/0187950 to Rising	Oct. 2, 2003	Rising
1115	Martin R. Wagner, <u>Understanding the ICAD System</u> , ICAD, Inc., 1990	1990	ICAD
1116	Oracle Configurator Developer, User's Guide, Release 11i for Windows 95/98/2000 and Windows NT 4.0	April 2002	Oracle
1117	Stefan Schulz, <u>CBR-Works A State-of-the-Art Shell for Case-Based Application Building</u> , TECINNO GmbH, 1999	1999	CBR

Exhibit No.	Description	Date	Identifier
1118	Richard M. Stallman and Gerald Jay Sussman, <u>Forward Reasoning and Dependency-Directed Backtracking In a System for Computer-Aided Circuit Analysis</u> , MIT Artificial Intelligence Laboratory, Memo No. 380, Sept. 1976	Sept. 1976	Stallman

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.