IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent of:	Smith et al.
U.S. Patent No.:	7,241,034 B2
Issue Date:	July 10, 2007
Appl. Serial No.:	10/285,312
Filing Date:	October 31, 2002
Reexam. Cert. No.:	7,241,034 C1
Reexam. Cert. Date:	June 14, 2013.

Title: AUTOMATIC DIRECTIONAL CONTROL SYSTEM FOR VEHICLE HEADLIGHTS

Mail Stop Patent Board

Patent Trial and Appeal Board U.S. Patent and Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450

PETITION FOR INTER PARTES REVIEW OF CLAIMS 3-26 AND 28-35 OF UNITED STATES PATENT NO. 7,241,034 C1 PURSUANT TO 35 U.S.C. §§ 311–319, 37 C.F.R. § 42

DOCKET A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

TABLE OF CONTENTS

I.	INTRODUCTION - This Petition Presents the Sam Were Instituted in IPR2016-00079		
II.	MANDATORY NOTICES UNDER 37 C.F.R § 42	.82	
	 A. Related PTO Proceedings B. Litigation Involving the '034 Patent C. Real Party-in-Interest D. Designation of Counsel, Consent to Service, Fees 	2 4 and Payment of	
III.	REQUIREMENTS FOR IPR UNDER 37 C.F.R. §§	§ 42.1045	
	A. Grounds for Standing Under 37 C.F.R. § 42.B. Identification of Challenge Under 37 C.F.R.		
IV.	SUMMARY OF THE '034 PATENT	8	
	 A. The Alleged Invention of the '034 Patent B. Background of the Art C. Summary of the Prosecution Histories of the Reexamination Certificate 		
	 The Original Application & '034 Pater Reexamination 	nt12	
V.	GENERAL PRINCIPLES OF OBVIOUSNESS	19	
VI.	CLAIMS 3-26, 28-35 ARE UNPATENTABLE OVER PRIOR ART21		
	 A. IPR Ground 1 - Claims 7, 8-9, 13-18, 20-21, 32 and 35 are unpatentable as obvious from I Takahashi 1. All of the limitations of independent claims 8, 14-18, 20-21, 23-24, 28 and 3 Kato. 	Kato in view of 	
	 Kato Claim Chart for Kato Takahashi discloses the threshold limit Claims 7, 8, 14-18, 20-21, 23-24, 28 at unpatentable as obvious from Kato in v 		
	5. Takahashi also discloses the additional dependent claims 9, 13, 29, 31 and 35.		

	6. Claims 9, 13, 29, 31 and 35 are unpatentable as obvious
	from Kato in view of Takahashi35
B.	IPR Ground 2 – Claim 10 is unpatentable as obvious from Kato
	in view of Takahashi and further in view of Mori
C.	IPR Ground 3 – Claims 11 and 19 are unpatentable as obvious
	from Kato in view of Takahashi and further in view of Uguchi39
D.	IPR Ground 4 – Claim 12 is unpatentable as obvious from Kato
	in view of Takahashi and further in view of Ishikawa42
E.	IPR Ground 5 – Claim 22 is unpatentable as obvious from Kato
	in view of Takahashi and further in view of Panter
F.	IPR Ground 6 – Claims 25 and 26 are unpatentable as obvious
	from Kato in view of Takahashi and further in view of Suzuki44
G.	IPR Ground 7 – Claims 30, 33 and 34 are unpatentable as
	obvious from Kato in view of Takahashi and further in view of
	Okuchi
H.	IPR Ground 8 – Claims 3 and 6 are unpatentable as obvious
	from Kato in view of Uguchi
	1. All of the limitations of independent claim 3 and
	dependent claim 6 are disclosed in Kato, except the
	threshold and rate of change of steering angle limitations
	of claim 3, which are disclosed in Uguchi
	2. Uguchi discloses the threshold limitation and the rate of
	change of steering angle limitation in
	claim 3
	3. Independent claim 3 and dependent claim 6 are
	unpatentable as obvious from the combination of Kato
	and Uguchi
I.	IPR Ground 9 – Claim 4 is unpatentable as obvious from Kato
	in view of Uguchi and further in view of Ishikawa
J.	IPR Ground 10 – Claim 5 is unpatentable as obvious from Kato
σ.	in view of Uguchi and further in view of Takahashi
CON	
CON	CLUSION

VII.

EXHIBIT LIST

Exhibit No.	Title of Document
SL-1001	U.S. Patent No. 7,241,034
SL-1002	Reexamination Certificate, U.S. Patent No. 7,241,034 C1
SL-1003	File History for U.S. Serial No. 10/285,312
SL-1004	File History for Ex Parte Reexamination Proceedings 90/011,011
SL-1005	File History for Merged Reexamination Proceedings 90/011,011 & 95/001,621
SL-1006	Kato, Japan Patent Application Publication H10-324191 ("Kato")
SL-1007	Certified Translation of Kato
SL-1008	Takahashi, UK Published Patent Application GB 2 309 774 A ("Takahashi")
SL-1009	Mori et al., Japan Patent Application Publication H7-164960 ("Mori")
SL-1010	Certified Translation of Mori
SL-1011	Uguchi et al, Japan Patent Application Publication H01-223042 ("Uguchi")
SL-1012	Certified Translation of Uguchi
SL-1013	Ishikawa et al, "Auto-Levelling Projector Headlamp System with Rotatable Light Shield," SAE Technical Paper Series No. 930726, March 1993 ("Ishikawa")
SL-1014	Panter, U.S. Patent No. 5,751,832 ("Panter")
SL-1015	Suzuki et al., Japan Patent Application Publication H6-335228 ("Suzuki")
SL-1016	Certified Translation of Suzuki

DOCKET A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

Exhibit No.	Title of Document
SL-1017	Okuchi et al., U.S. Patent No. 6,193,398 ("Okuchi")
SL-1018	Okuchi et al., U.S. Patent Application No. 09/333,686 ("Okuchi Application")
SL-1019	Expert Declaration of Harvey Weinberg Appendix A: Harvey Weinberg CV Appendix B: Expert Declaration of Ralph V. Wilhelm
SL-1020	Curriculum Vitae of Ralph V. Wilhelm
SL-1021	Dunning, U.S. Patent No. 982,803 ("Dunning")
SL-1022	McVey et al., U.S. Patent No. 1,524,443 ("McVey")
SL-1023	Schjotz et al., U.S. Patent No. 1,595,879 ("Schjotz")
SL-1024	Yssel, U.S. Patent No. 3,316,397 ("Yssel")
SL-1025	Fleury et al., U.S. Patent No. 3,617,731 ("Fleury")
SL-1026	USPTO Assignment Records for U.S. Patent No. 7,241,034
SL-1027	STN on the Web Session
SL-1028	Hogrefe et al., U.S. Patent No. 6,227,691 ("Hogrefe")

DOCKET A L A R M



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.