### 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.

ADAPTIVE HEADLAMP TECHNOLOGIES, INC. Patent Owner

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Case IPR2016-01740 Patent 7,241,034 B2

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) SL Corp. v. Adaptive Headlamp Technologies, Inc., Case IPR2016-00193; and



(c) SL Corp. v. Adaptive Headlamp Technologies, Inc., Case IPR2016-01368.

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. FCA US LLC ("Chrysler"), Maserati North America, Inc. & Fiat Chrysler Automobiles N.V., Civil Action No. 1:15cv00073, pending in the District of Delaware.
- (b) Adaptive Headlamp Technologies, Inc. v. Hyundai Motor America, Civil Action No. 1:15cv00563, pending in the District of Delaware.
- (c) Adaptive Headlamp Technologies, Inc. v. Mazda Motor of North America, Inc., Civil Action No. 1:15cv00782, pending in the District of Delaware.
- (d) Adaptive Headlamp Technologies, Inc. v. Nissan North America Inc., Civil Action No. 1:15cv00074, pending in the District of Delaware.
- (e) Adaptive Headlamp Technologies, Inc. v. Toyota Motor Sales, U.S.A., Inc., Civil Action No. 1:15cv00779, pending in the District of Delaware; and
- (f) 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:

Back-up Counsel:

Brett M. Pinkus (Reg. No. 59,980)

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Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney for lead and back-up counsel 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 <a href="IPR@fsclaw.com">IPR@fsclaw.com</a>. 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: November 8, 2016. Respectfully submitted,

By: / Brett M. Pinkus/

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