

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**JOHN CRANE, INC., JOHN CRANE
PRODUCTION SOLUTIONS, INC., & JOHN CRANE GROUP CORP.,**

Petitioners,

v.

FINALROD IP, LLC,

Patent Owner.

**IPR2016-01786
U.S. Patent No. 9,045,951
Issued June 2, 2015**

**PETITION FOR INTER PARTES REVIEW
UNDER 35 U.S.C. §§ 311-318 & 37 C.F.R. 42.100 *et. seq.***

Table of Contents

I.	MANDATORY NOTICES (37 C.F.R. § 42.8)	1
A.	Real Party-In Interest (37 C.F.R. § 42.8(b)(1))	1
B.	Related Matters (37 C.F.R. § 42.8(b)(2))	1
C.	Counsel & Service Information (37 C.F.R. §§ 42.8(b)(3)-(4))	2
II.	CERTIFICATION AND FEES	2
III.	IDENTIFICATION OF CHALLENGE (37 C.F.R. § 42.104(b)) & RELIEF REQUESTED (37 C.F.R. § 42.22(a)(1))	2
IV.	BACKGROUND INFORMATION FOR THE '951 PATENT	3
A.	Introduction	3
B.	Background of Field of Art	5
C.	Overview of the '951 Patent	8
D.	Prosecution History of the '951 Patent	10
V.	THE CLAIMS OF THE '951 PATENT ARE UNPATENTABLE	12
A.	Relevant Field of Art and Level of Ordinary Skill	12
B.	Independent Claims Listing	12
C.	Claim Constructions	20
(a)	<i>“define a [first/second/third] distribution of force”</i> (claims 4, 7, 14, and 21)	21
(b)	<i>“such that”</i> (Claims 4, 7, 14-15, 21)	22
D.	Ground 1: Claims 4, 6-8, 14-15, 17, 21-22, 35, 47, 52, and 65-68 are unpatentable under 35 U.S.C. §103 as obvious over the Rutledge '431 Patent in view of Iwasaki & McKay	25
(a)	Overview of Rutledge '431, Iwasaki, and McKay Patents	25
(b)	Reasons and Motivation to Combine	26
(c)	Independent Claims 4, 7, 14, and 21	27
(d)	Claims 6 and 52	41

(e) Claims 8 and 35	43
(f) Claims 15 and 22	45
(g) Claim 17	46
(h) Claims 65-68.....	48
E. Ground 2: Claims 50, 57, and 59 are unpatentable under 35 U.S.C. §103 as obvious over the Rutledge '431, Iwasaki, and McKay Patents further in view of Anderson	50
(a) Reasons and Motivation to Combine	50
(b) Claim 50	52
(c) Claim 57	55
(d) Claim 59	56
VI. CONCLUSION.....	58

EXHIBIT LIST

Exhibit	Case No. IPR2016-01786
1001	U.S. Patent No. 9,045,951 (“’951 Patent”)
1002	U.S. Patent No. 9,045,951 File History
1003	U.S. Patent No. 6,193,431 (“Rutledge ’431 Patent”)
1004	U.S. Patent No. 4,475,839 (“Strandberg”)
1005	U.S. Patent No. 4,662,774 (“Morrow”)
1006	U.S. Patent No. 8,113,277 (“Rutledge ’277 Patent”)
1007	U.S. Patent No. 4,822,201 (“Iwasaki”)
1008	U.S. Patent No. 4,919,560 (“Rutledge ’560 Patent”)
1009	U.S. Patent No. 5,253,946 (“Watkins”)
1010	Declaration of Gary R. Wooley
1011	Side-by-Side Comparison of the ’951 Patent claims
1012	U.S. Patent No. 4,401,396 (“McKay”)
1013	U.S. Reissue Patent No. RE32,865 (“Rutledge ’865 Patent”)
1014	U.S. Patent No. 7,730,938 (“Rutledge ’938 Patent”)
1015	Edward L. Hoffman, Finite Element Analysis of Sucker Rod Couplings with Guidelines for Improving Fatigue Life, Sandia National Laboratories, (Jul. 11, 1997) (“Hoffman Article”).
1016	U.S. Patent No. 8,062,463 (“Rutledge ’463 Patent”)
1017	U.S. Patent No. 6,886,484 (“Thomas”)
1018	U.S. Patent No. 4,653,953 (“Anderson”)
1019	Printout of Fiberod History from “https://superod.com/about-us”
1020	Press Release for Smith’s purchase of Fiberod (March 19, 2008)
1021	Asset Purchase Agreement Between Smiths and Fiberod (March 2008)
1022	Intellectual Property Disclosure Schedule from Asset Purchase Agreement
1023	U.S. Patent No. 8,851,162 (“Rutledge ’162 Patent”)
1024	U.S. Patent No. 9,181,757 (“Rutledge ’757 Patent”)
1025	Case No. 7:15-cv-00097 (W.D. Tex.), September 15, 2015, First Amended Complaint

Petitioners, John Crane, Inc., John Crane Production Solutions, Inc., and John Crane Group Corp. (“John Crane”), respectfully request Inter Partes Review (“IPR”) of claims 4, 6-8, 14-15, 17, 21-22, 35, 50, 52, 57, 59, and 65-68 (“Challenged Claims”) of U.S. Patent No. 9,045,951 (“the ’951 Patent”, Exhibit 1001), believed to be currently assigned to Finalrod IP, LLC (“Finalrod” or “Patent Owner”).¹

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

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

Petitioners, John Crane, Inc., John Crane Production Solutions, Inc., and John Crane Group Corp., are the real parties-in-interest.

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

The ’951 Patent is also currently the subject of the following litigations: *Finalrod IP, LLC, et al. v. John Crane, Inc., et al.*, Case No. 7-15-cv-00097 (W.D. Tex. 2015). Petitioners are filing an additional IPR of claims 60-63 and 69 concurrently herewith as IPR2016-01827. The ’951 Patent is a continuation-in-part of U.S. Patent No. 8,851,162 (the “’162 Patent”), which was the subject of IPR2016-00232 (terminated).

¹ While no assignment data has been recorded at the U.S.P.T.O., Finalrod represented in District Court that it is the owner of the ’951 Patent. *See* Exhibit 1025, ¶ 13.

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