

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DENSO CORPORATION, DENSO INTERNATIONAL AMERICA, INC.,
ASMO CO. LTD., AND TOYOTA MOTOR CORPORATION
Petitioners

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner

CASE IPR: Unassigned

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,067,952
UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-.80 & 42.100-.123**

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. Patent No. 7,067,952 to Neal
1002	Prosecution File History of U.S. Patent No. 7,067,952
1003	JP P2000-184635 to Calsonic Kansei Corp. (“Calsonic”)
1004	Certified English Translation of JP 2000-184635 to Calsonic
1005	JP S62-138031 to Nippondenso (“DENSO”)
1006	Certified English Translation of JP S62-138031 to DENSO
1007	U.S. Patent No. 7,036,207 to Neal
1008	JP H11-341717 to Matsushita (“Matsushita”)
1009	Certified English Translation of JP H11-341717 to Matsushita
1010	U.S. Patent No. 5,694,268 to Dunfield (“Dunfield”)
1011	Polymer Data Handbook
1012	U.S. Patent No. 6,265,804 (“Nitta”)
1013	Declaration of Dr. Thomas R. Brinner

I. INTRODUCTION

Petitioners DENSO Corporation, DENSO International America, Inc., ASMO Co. Ltd., and Toyota Motor Corporation (“Petitioners”) respectfully request *inter partes* review under 35 U.S.C. § 311 and 37 C.F.R. § 42.100 of claims 1-6 and 8-14 of U.S. Patent No. 7,067,952 (“the ’952 Patent”), titled “Stator Assembly Made From A Molded Web Of Core Segments And Motor Using Same” (Ex. 1001).

II. COMPLIANCE WITH FORMAL REQUIREMENTS

A. Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4)

1. Real Party-In-Interest

The following is a list of Petitioners (and additional real parties-in-interest): DENSO CORPORATION, DENSO INTERNATIONAL AMERICA, Inc., ASMO Co. Ltd., and Toyota Motor Corp., which is the sole owner of Toyota Motor Sales, U.S.A., Inc., and the ultimate corporate parent for Toyota Motor Engineering & Manufacturing North America, Inc., Toyota Motor North America, Inc., Toyota Motor Manufacturing, Indiana, Inc., and Toyota Motor Manufacturing, Kentucky, Inc.

2. Related Matters

Pursuant to 37 C.F.R. § 42.8(b)(2), Petitioners state that the ’952 Patent is the subject of a series of patent infringement lawsuits brought by the alleged

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