

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

INTELLECTUAL VENTURES II LLC,  
Patent Owner

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CASE IPR: Unassigned

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**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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## TABLE OF CONTENTS

|  | Page |
|--|------|
| I. INTRODUCTION .....  | 1    |
| II. COMPLIANCE WITH FORMAL REQUIREMENTS .....  | 1    |
| A. Mandatory Notices Under 37 C.F.R. §§ 42.8(b)(1)-(4) .....   | 1    |
| 1. Real Party-In-Interest .....  | 1    |
| 2. Related Matters .....   | 1    |
| 3. Lead and Back-Up Counsel .....  | 2    |
| 4. Service Information .....   | 4    |
| B. Proof of Service on the Patent Owner .....  | 4    |
| C. Power of Attorney .....   | 4    |
| D. Standing .....  | 4    |
| E. Fees .....  | 5    |
| III. STATEMENT OF PRECISE RELIEF REQUESTED .....   | 5    |
| IV. FULL STATEMENT OF REASONS FOR REQUESTED RELIEF .....   | 6    |
| A. Summary of the '952 Patent .....  | 6    |
| B. The '952 Patent Prosecution History .....   | 11   |
| C. No Claim of the '952 Patent is Entitled to the Effective Filing<br>Date of the '207 Patent .....                                  | 12   |
| D. Person of Ordinary Skill in the Art .....   | 14   |
| E. Claim Construction .....  | 14   |
| 1. “a phase change material” (claims 1, 10, and 14) .....  | 15   |
| 2. “the bridge is formed by interconnecting two mating<br>sections formed from the phase change material” (claims<br>9 and 10) ..... | 16   |
| F. Ground 1: Claims 10 and 14 are anticipated under 35 U.S.C.<br>§ 102 (b) (pre-AIA) by Calsonic .....                               | 17   |
| 1. Calsonic is § 102(b) (pre-AIA) Prior Art .....  | 17   |

|    |   |    |
|----|---|----|
| 2. | Detailed Analysis .....   | 19 |
| G. | Ground 2: Claims 1, 2, 4, 6, 8, 9, 12, and 13 are rendered obvious under 35 U.S.C. § 103(a) (pre-AIA) by Calsonic in view of Matsushita .....                                       | 33 |
| 1. | Calsonic is § 102(b) (pre-AIA) Prior Art.....   | 33 |
| 2. | Matsushita is § 102(b) (pre-AIA) Prior Art.....   | 33 |
| 3. | Detailed Analysis .....   | 34 |
| H. | Ground 3: Claims 10, 12, and 14 are rendered obvious under 35 U.S.C. § 103(a) (pre-AIA) by DENSO in view of Calsonic.....   | 53 |
| 1. | DENSO is § 102(b) (pre-AIA) Prior Art .....   | 53 |
| 2. | Calsonic is § 102(b) Prior Art.....   | 54 |
| 3. | Detailed Analysis .....   | 54 |
| I. | Ground 4: Claim 11 is rendered obvious under 35 U.S.C. § 103(a) (pre-AIA) by Calsonic in view of Dunfield.....  | 70 |
| 1. | Calsonic is § 102(b) (pre-AIA) Prior Art.....   | 70 |
| 2. | Dunfield is § 102(b) (pre-AIA) Prior Art .....  | 70 |
| 3. | Detailed Analysis .....   | 71 |
| J. | Ground 5: Claims 3 and 5 are rendered obvious under 35 U.S.C. § 103(a) (pre-AIA) by Calsonic and Matsushita in view of the Knowledge of a Person of Ordinary Skill in the Art ..... | 74 |
| V. | CONCLUSION.....   | 78 |

## 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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