

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

MITSUBA CORPORATION AND AMERICAN MITSUBA CORPORATION

Petitioners

v.

INTELLECTUAL VENTURES II LLC

Patent Owner

Case No.: IPR2017-_____

Patent No. 7,067,952

Title: Stator Assembly Made from a Molded
Web of Core Segments and Motor Using Same

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,067,952

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Petitioners Mitsuba Corporation and American Mitsuba Corporation (collectively, “Mitsuba”) request *inter partes* review (“IPR”) of claims 10-12 (collectively, the “Challenged Claims”) of U.S. Patent No. 7,067,952 (the “’952 patent”) (Ex. 1001).

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

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

Mitsuba is the real party-in-interest for Petitioner.

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

Mitsuba identifies the following judicial or administrative matters that could affect or could be affected by a decision in this proceeding:

Name	Case No.	Court / Agency	Filed
<i>Intellectual Ventures II LLC v. Honda Motor Co., Ltd. et al.</i>	1:17-cv-00294	D. Del.	March 20, 2017
<i>Intellectual Ventures II LLC v. Denso Corp. et al.</i>	1:17-cv-00297	D. Del.	March 20, 2017
<i>Intellectual Ventures II LLC v. Mitsuba Corp., et al.</i>	1:17-cv-00298	D. Del.	March 20, 2017
<i>Intellectual Ventures II LLC v. Nidec Corp., et al.</i>	1:17-cv-00299	D. Del.	March 20, 2017
<i>Intellectual Ventures II LLC v. Toyota Motor Corp. et al.</i>	1:17-cv-00300	D. Del.	March 20, 2017
<i>Certain Thermoplastic-Encapsulated Electric Motors, Components Thereof, and Products and Vehicles Containing Same</i>	337-TA-1052	ITC	March 21, 2017
<i>Toyota Motor Corp. and Denso Corp. v. Intellectual Ventures II LLC</i>	IPR2017-01497	PTAB	June 9, 2017
<i>Denso Corp. et al v. Intellectual Ventures II LLC</i>	IPR2017-01631	PTAB	June 16, 2017

<i>Certain Thermoplastic-Encapsulated Electric Motors, Components Thereof, and Products and Vehicles Containing Same</i>	Dkt. No. 3243	ITC	August 10, 2017
<i>Certain Thermoplastic-Encapsulated Electric Motors, Components Thereof, and Products and Vehicles Containing Same II</i>	337-TA-1073	ITC	September 5, 2017

1. Procedural History Regarding Related Matters

On March 20 and 21, 2017 Intellectual Ventures II LLC (“IV”) sued Mitsuba and numerous other defendants/respondents in district court and the International Trade Commission (“ITC”) for alleged infringement of the ’952 patent. Dkt. Nos. 17-cv-00294; -00297; -00298; -00299; -00300; 337-TA-1052 (the “1052 Investigation”). On June 9 and 16, 2017 various Toyota, DENSO, and/or ASMO entities filed IPR Nos. 2017-01497 and 2017-01631 against the ’952 patent.

On June 20, 2017 the respondents in the 1052 Investigation moved to terminate the 1052 Investigation after discovering that IV did not own the asserted patents, including the ’952 patent. On August 3, 2017 the Administrative Law Judge entered an initial determination finding that IV was not the owner of the asserted patents, including the ’952 patent, and that the 1052 Investigation should be terminated. On September 19, 2017, the Commission terminated the 1052 Investigation.

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