

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GARMIN INTERNATIONAL, INC. AND GARMIN USA, INC.
Petitioners

v.

LOGANTREE, LP
Patent Owner

Case No. IPR2018-00565
Patent No. 6,059,576

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,059,576**

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APPENDIX OF EXHIBITS

Exhibit 1001	U.S. Patent No. 6,059,576 to Brann
Exhibit 1002	File History of U.S. Patent No. 6,059,576
Exhibit 1003	File History of Reexamination Request No. 90/013,201
Exhibit 1004	U.S. Patent No. 5,978,972 to Stewart et al.
Exhibit 1005	U.S. Provisional Application No. 60/020,271
Exhibit 1006	U.S. Patent No. 5,546,609 to Rush, III
Exhibit 1007	(left intentionally blank)
Exhibit 1008	U.S. Patent No. 5,474,083 to Church et al.
Exhibit 1009	U.S. Patent No. 5,976,083 to Richardson et al.
Exhibit 1010	Declaration of Dr. Andrew C. Singer and Appendix A
Exhibit 1011	J.R.W. Morris, "Accelerometry – A Technique for the Measurement of Human Body Movements," J. Biomechanics, Vol. 6, Pergamon Press (1973, pp. 729-736)
Exhibit 1012	U.S. Patent No. 3,797,010 to Adler et al.
Exhibit 1013	U.S. Patent No. 5,803,740 to Gesink et al.
Exhibit 1014	UK Patent Application No. GB 2,225,459A to Holder
Exhibit 1015	C. Verplaetse, "Inertial proprioceptive devices: Self-motion-sensing toys and tools," IBM Systems Journal, Vol. 35, Nos. 3&4 (1996, pp. 639-650)
Exhibit 1016	(left intentionally blank)
Exhibit 1017	Robert C Cantu, "Head injuries in sport," Br J Sports Med 30 (289-296; 1996)
Exhibit 1018	Affidavit of Service dated February 22, 2017
Exhibit 1019	Exhibit C to Plaintiff's Original Complaint

I. INTRODUCTION

Petitioners Garmin International, Inc. and Garmin USA, Inc. respectfully request *inter partes* review (“IPR”) of claims 1, 2, 4, 5, 7-14, 56-58, 140, 144, and 146 (“the Challenged Claims”) of U.S. Patent No. 6,059,576 (“the ’576 patent”). As demonstrated below, there is a reasonable likelihood that Petitioners will prevail in establishing the unpatentability of the Challenged Claims.

II. SUMMARY OF THE ’576 PATENT

A. Description of the Alleged Invention of the ’576 Patent

The ’576 patent generally describes “[a]n electronic device, system and method to monitor and train an individual on proper motion during physical movement.” EX1001, Abstract. The ’576 patent purportedly solves problems with prior motion sensing/monitoring devices that either record motion, but “do not warn the device wearer when the wearer is nearing, or has reached, a potential angle of movement” or warn the wearer of an improper movement, but do not analyze the detected motion data. *Id.* at 1:22-54. The alleged key feature of the “invention is that it gives instant information to the wearer at the moment of incorrect movement and also records the information for future reference and analysis.” *Id.* at 6:16-19. Thus, the key feature of the ’576 patent’s invention was merely combining known features of the prior art motion sensing devices.

The system includes a movement measuring device 12 and a download device 14 connected to a computer 16:

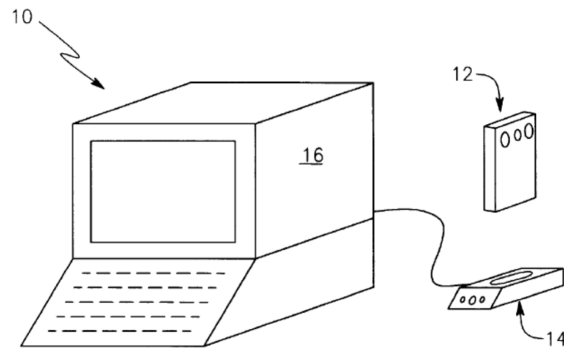


FIG. 1

Id. at Fig. 1; *see also, id.* at 3:22-24.

The movement measuring device 12 “is designed to be physically attached to a user” and “may be worn by the individual being monitored in a variety of positions based on the specific movement being observed.” *Id.* at 3:24-31. The measuring device 12 includes internal components including a microprocessor 32, movement sensor 30, and clock 46:

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