

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

Shenzhen Zhiyi Technology Co. Ltd., d/b/a iLife,
Petitioner

v.

iRobot Corp.,
Patent Owner.

Patent No. 6,809,490 to Jones et al.

IPR Case No. IPR2017-02061

**PETITION FOR *INTER PARTES* REVIEW OF CLAIMS 1-3,
7, 12, AND 42 OF U.S. PATENT NO. 6,809,490 UNDER 35
U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.100 ET SEQ.**

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1001	U.S. Patent No. 6,809,490 (“490 patent”)
1002	File history of U.S. Patent No. 6,809,490
1003	Declaration of C. Douglass Locke, Ph.D., Regarding Invalidity of the Challenged Claims of U.S. Patent No. 6,809,490 (“Locke”)
1004	Certified Translation of Japanese Unexamined Patent Application Publication H11-212642, published August 6, 1999 (“Ueno-642”)
1005	U.S. Patent No. 6,493,612 to Bissett (“Bissett-612”)
1006	Japanese Unexamined Patent Application Publication H11-212642, published August 6, 1999 (non-translated)
1007	Affidavit certifying translation of Japanese Unexamined Patent Application Publication H11-212642
1008	Joint Claim Construction Chart, as submitted in Investigation No. 337-TA-1057, August 18, 2017
1009	U.K. Patent Application 9827758
1010	PCT Publication WO 00/38026

iLife (“Petitioner”) hereby seeks *inter partes* review of Claims 1-3, 7, 12, and 42 (“the Challenged Claims”) of U.S. Patent No. 6,809,490 (Ex. 1001 (the “’490 patent”). The Challenged Claims of the ’490 patent do not claim anything new; they claim previously-known operational modes for mobile robots. The Challenged Claims in the patent should therefore be canceled for the reasons described in this Petition.

I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1) FOR INTER PARTES REVIEW

A. Real Party in Interest Under 37 C.F.R. § 42.8(b)(1)

The real parties-in-interest in this Petition are: Shenzhen Zhiyi Technology Co. Ltd. d/b/a iLife and iRobot Corp.

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

There is a pending proceeding before the U.S. International Trade Commission that involves the Challenged Claims of the ’233 patent: *In re Certain Robotic Vacuum Cleaning Devices And Components Thereof Such As Spare Parts*, Investigation No. 337-TA-1057 (the “ITC Investigation”).

There is also a federal district court litigation filed by iRobot Corporation against Petitioner that also involves the Challenged Claims of the ’233 patent: *iRobot Corp. v. Shenzhen Zhiyi Technology Co. Ltd. d/b/a iLife*, Case No. 1:17-cv-10652 (D. Mass.) (the “District Court Case”).

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