

**PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 10,261,648**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In the *Inter Partes* Review of U.S. Patent No. 10,261,648

Trial No.: Not Yet Assigned

Issued: April 16, 2019

Filed: May 23, 2016

Inventors: John T. Uken, *et al.*

Assignee: Magna Mirrors of America, Inc.

Title: EXTERIOR REARVIEW MIRROR ASSEMBLY

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**PETITION FOR *INTER PARTES* REVIEW**  
**PURSUANT TO 35 U.S.C. §§ 311–19, 37 C.F.R. § 42**

On behalf of Motherson Innovations Company Limited (“Motherson” or “Petitioner”) and pursuant to 35 U.S.C. §§ 311–19 and 37 C.F.R. § 42, *inter partes* review (“IPR”) is respectfully requested for claims 1–13 and 15–36 (“the Challenged Claims”) of U.S. Patent No. 10,261,648 (“the ’648 patent”) (Ex. 1001). As explained in this Petition, there exists a reasonable likelihood that Motherson will prevail with respect to at least one of the Challenged Claims. Motherson respectfully submits that an IPR should be instituted and that the Challenged Claims should be canceled as unpatentable.

The undersigned representative of Petitioner authorizes the Office to charge the \$47,000 Petition and Post-Institution Fees, and any additional fees, to Deposit Account 501432, ref: 524322-730202.

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# PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 10,261,648

## I. Grounds For Standing Pursuant To 37 C.F.R. § 42.104(a)

Petitioner certifies the '648 patent is available for IPR and Petitioner is not barred or estopped from requesting IPR challenging the patent claims on the grounds identified herein.

## II. Background Information For The '648 Patent

### A. Overview Of The '648 Patent

The claims of the '648 patent (36 in total) are generally directed to a rearview mirror assembly, mounted on the exterior of a vehicle, with an electrically-operable, multi-axis mirror adjustment mechanism. The mirror assembly comprises a reflective mirror element that is fixedly attached to the mirror housing, and thus moves in tandem with the housing. (Ex. 1001, Abstract, 59:7–22.)

Figure 56 of the '648 patent (annotated below) depicts a potential embodiment of claim 1. It shows an exterior rearview mirror assembly 610 comprising a reflective (mirror) element 612, which is fixedly attached to a mirror head housing 614. (Ex. 1001, 58:57–65.) The mirror head housing 614 is attached to an inner bracket 616, which is attached to a first actuator 618. The rotation of first actuator 618 rotates bracket 616 and mirror head housing 614 (with attached mirror element 612) about a first pivot axis 618 $\alpha$ . First actuator 618 is attached to a second bracket 620 that is mounted to a second actuator 622. The rotation of second actuator 622 rotates bracket 620, first actuator 618, bracket 616, and mirror head housing 614 (with attached mirror element

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