

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Motherson Innovations Co., Ltd.,  
Petitioner,

v.

Magna Mirrors of America, Inc.,  
Patent Owner.

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Case IPR2020-00777  
Patent No. 10,261,648

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**Supplemental Declaration of Michael Nranian in Support of  
Patent Owner Magna Mirrors of America, Inc.**

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## I. Introduction

1. I previously provided a declaration in support of support of Patent Owner, Magna Mirrors of America, Inc. (“Magna”), regarding Motherson Innovations Co., Ltd.’s (“Motherson”) Petition for Inter Partes Review of U.S. Patent No. 10,261,648 (“the ‘648 Patent”). My prior declaration is of record in the present proceeding, IPR2020-00777, as Exhibit 2001.

2. Since my prior declaration, the Patent Trial and Appeal Board (“Board”) issued its Decision Granting Institution of *Inter Partes* Review of the ‘648 Patent (Paper No. 7). I have reviewed the Institution Decision, and provide additional opinions in view of the Institution Decision.

3. My background and qualifications are set forth in Exhibits 2001 and 2002.

4. All statements herein made of my own knowledge are true, and all statements herein that are based on information and belief are believed to be true. I am over 21 years of age and am competent to make this declaration.

## II. Claim Construction: “Exterior Mirror Reflective Element Fixedly Attached At Said Mirror Head”

5. In its Institution Decision, the Board did not preliminarily adopt Patent Owner’s construction for “exterior mirror reflective element attached at said mirror head. Paper No. 7 at 12–14. As part of its reasoning, the Board stated that “the description in the ‘648 specification does not make a distinction between a

configuration with the mirror reflective element attached at the peripheral exterior surface of the mirror head, and a configuration where the mirror reflective element is attached inward from that surface of the mirror head.” Paper No. 7 at 13.

6. I respectfully disagree with the Board’s characterization of the ‘648 specification, and submit that the ‘648 specification does indeed make such a distinction for the reasons set forth in my prior declaration (Ex. 2001) at paragraphs 78–87. For the same reasons provided in those paragraphs of my earlier declaration, it is my opinion that one of skill in the art reading the ‘648 patent would consider the patent to be making a material distinction between: (i) the claimed configuration in which the mirror reflective element is attached at the peripheral exterior surface of the mirror head, and (ii) the prior art configuration where the mirror reflective element is attached inward from the surface of the mirror head.

### **III. Claim Construction: “Yaw” And “Roll”**

7. In my prior declaration, I provide my opinion on the ordinary meaning of the terms “yaw” and “roll” to one of skill in the art when reading the ‘648 patent. *See* Ex. 2001 at ¶¶ 117–126. I also explain why Petitioner’s proposed constructions do not accurately capture the term’s ordinary meaning, particularly because the Petitioner’s construction allows the yaw and roll axes to be defined in

ways that are contrary to how one of ordinary skill in the art would understand them. *Id.* at ¶ 127.

8. In the Institution Decision, the Board “agree[d] with Patent Owner (Prelim. Resp. 29–30) that Petitioner’s proposed constructions are overbroad.” Paper No. 7 at 15. The Board noted that “Patent Owner’s proposed constructions...define ‘yaw’ and ‘roll’ from the frame of reference of the vehicle as a whole.” *Id.* It also observed that the claims “recite a frame of reference for the yaw and roll adjustment” as “relative to the exterior portion of the equipped vehicle at which said exterior rearview mirror assembly is attached.” *Id.* at 14–15. The Board further stated that “[i]t is unclear. . .whether the ‘yaw’ and ‘roll’ with respect to the vehicle as a whole is the same as the ‘yaw’ and ‘roll’ with respect to ‘the exterior portion of the equipped vehicle at which said exterior rearview mirror assembly is attached,’ as recited in the applicable claims.” *Id.* at 15. The Board “invite[d] the parties to address this issue further during the trial.”

9. It is my opinion that one of skill in the art would understand the frame of reference identified in the claims themselves further supports Patent Owner’s constructions. As set forth below, if anything, the frame of reference set forth in the claims does not change the ordinary direction of the pitch, yaw, and roll coordinates known to one of skill in the art. If anything, it shifts that coordinate system from the center of the vehicle (the vehicle as whole), to the side of the

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