#### UNITED STATES PATENT AND TRADEMARK OFFICE

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### BEFORE THE PATENT TRIAL AND APPEAL BOARD

YITA LLC, Petitioner

v.

MACNEIL IP LLC, Patent Owner

Case No. IPR2020-01138 Patent No. 8,382,186

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 8,382,186

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Patent Trial and Appeal Board U.S. Patent & Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450



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		P	Petition for Inter Partes Review of U.S. Patent No. 8,382,186				
A.	Ground 1: Claims 1-7 would have been obvious over MacNeil37						
	1.	Inde	ependent claim 1				
		a.	Preamble: A vehicle floor tray thermoformed from a sheet of thermoplastic polymeric material of substantially uniform thickness				
		b.	Element 1.a: a central panel substantially conforming to a floor of a vehicle foot well				
		c.	Element 1.b: the central panel of the floor tray having at least one longitudinally disposed lateral side and at least one transversely disposed lateral side				
		d.	Element 1.c: a first panel integrally formed with the central panel of the floor tray, upwardly extending from the transversely disposed lateral side of the central panel of the floor tray, and closely conforming to a first foot well wall				
		e.	Element 1.d: the first panel of the floor tray joined to the central panel of the floor tray by a curved transition48				
		f.	Element 1.e: a second panel integrally formed with the central panel of the floor tray and the first panel, upwardly extending from the longitudinally disposed lateral side of the central panel of the floor tray, and closely conforming to a second foot well wall				
		g.	Element 1.f: the second panel of the floor tray joined to the central panel of the floor tray and to the first panel of the floor tray by curved transitions				
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		i.	Element 1.h: a plurality of upstanding, hollow, elongate baffles disposed in the reservoir62				
		j.	Element 1.i: each of the baffles having at least two ends remote from each other64				

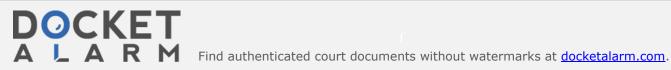


		Element 1.j: the central panel, the first panel, the second panel, the reservoir and the baffles each having a thickness from a point on the upper surface to a closest point on the bottom surface thereof, said thicknesses, as a result of the tray being thermoformed from the sheet of thermoplastic polymeric material of substantially uniform thickness, being substantially uniform throughout the tray		
	1.	Element 1.k: the baffles each having a width, in any horizontal direction, of more than two times its thickness70		
		Element 1.1: the baffles adapted to elevate the shoe or foot of the occupant above fluid collected in the reservoir, and further adapted to impede lateral movement, induced by a change in vehicle speed or direction, of fluid collected in the reservoir		
	n.	Element 1.m: any portion of the reservoir connected to a remote portion of the reservoir by a path formed around ends of the baffles		
	0.	A POSA would have been motivated to achieve the claimed uniform thickness		
	p.	A POSA would have had a reasonable expectation of success		
2.	Claim	279		
3.	Claim	382		
4.	Claim 4			
5.	Claim	588		
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