

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,
Petitioner,

v.

CUOZZO SPEED TECHNOLOGIES LLC,
Patent Owner.

CASE IPR: 2014-01393
Patent 6,778,074

PATENT OWNER'S RESPONSE

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I. INTRODUCTION.

Pursuant to 37 C.F.R. § 42.120, Patent Owner Cuozzo Speed Technologies LLC (“Patent Owner”) submits this response to the Petition for *Inter Partes* Review (“Petition”) of claims 1-20 of U.S. Patent No. 6,778,074 (the “‘074 Patent”) filed by Ford Motor Company (“Petitioner”). Paper 4 (“Petition” or “Pet.”) at 1.

On February 9, 2014, the Patent Trial and Appeal Board (“Board”) instituted *inter partes* review based on the following grounds of unpatentability alleged in the Petition:

1. Claim 1, 9, 10, and 19, under 35 U.S.C. § 102(b), as anticipated by Nagoshi;
2. Claims 2, 11–13, and 20, under 35 U.S.C. § 103(a), as obvious over Nagoshi and Vaughn;
3. Claims 4 and 5, under 35 U.S.C. § 103(a), as obvious over Nagoshi and Evans;
4. Claims 6 and 18, under 35 U.S.C. § 103(a), as obvious over Nagoshi and Tegethoff; and
5. Claims 3 and 14–17 under 35 U.S.C. § 103(a), as obvious over Nagoshi, Evans, and Wendt; and

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