

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner

v.

Patent of CUOZZO SPEED TECHNOLOGIES LLC
Patent Owner

Case IPR: To Be Assigned

Patent 6,778,074

**PETITION FOR *INTER PARTES* REVIEW
UNDER 37 C.F.R. § 42.100**

TABLE OF CONTENTS

I.	SUMMARY OF THE '074 PATENT	1
A.	Description of the Alleged Invention of the '074 Patent	1
B.	Summary of the Prosecution History of the '074 Patent	2
II.	THERE IS A REASONABLE LIKELIHOOD THAT AT LEAST ONE CLAIM OF THE '074 PATENT IS UNPATENTABLE UNDER 37 C.F.R. § 42.104(b)(4)	4
III.	REQUIREMENTS FOR <i>INTER PARTES</i> REVIEW UNDER 37 C.F.R. §§ 42.104	7
A.	Certification of Grounds for Standing Under 37 C.F.R. § 42.104(a)	7
B.	Identification of Challenge Under 37 C.F.R. § 42.104(b) and Relief Requested	8
IV.	DETAILED EXPLANATION UNDER 37 C.F.R. §§ 42.104(b)	12
A.	Claim 1 (Independent)	12
B.	Claim 2 (Dependent)	21
C.	Claim 3 (Dependent)	22
D.	Claim 4 (Dependent)	24
E.	Claim 5 (Dependent)	25
F.	Claim 6 (Dependent)	26
G.	Claim 7 (Dependent)	27
H.	Claim 8 (Dependent)	31
I.	Claim 9 (Dependent)	33
J.	Claim 10 (Independent)	34
K.	Claim 11 (Dependent)	35
L.	Claim 12 (Dependent)	36
M.	Claim 13 (Dependent)	36

N. Claim 14 (Dependent)	37
O. Claim 15 (Dependent)	38
P. Claim 16 (Dependent)	38
Q. Claim 17 (Dependent)	38
R. Claim 18 (Dependent)	39
S. Claim 19 (Dependent)	39
T. Claim 20 (Independent)	40
V. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(a)(1)	41
A. Real Party-In-Interest Under 37 C.F.R. § 42.8(b)(1)	42
B. Related Matters Under 37 C.F.R. § 42.8(b)(2)	42
C. Lead and Back-Up Counsel Under 37 C.F.R. § 42.8(b)(3) and Service Information Under 37 C.F.R. § 42.8(b)(4)	44
VI. STATEMENT REGARDING NO REDUNDANCY	44
VII. CONCLUSION	49

APPENDIX OF EXHIBITS

Exhibit	Description	Statement of Relevance	Filed
1001	U.S.P.N. 6,778,074 to Cuozzo	Patent at issue	☒
1002	JP H05-067294 to Nagoshi (Japanese)	Invalidating prior art to the challenged claims	☒
1003	JP H05-067294 to Nagoshi (English)	English translation of invalidating prior art to the challenged claims	☒
1004	Affidavit of Michael O’Keeffe	Affidavit of Michael O’Keeffe attesting to the accuracy of the translation of the prior art Nagoshi reference from Japanese to English	☒
1005	Federal Circuit Brief	Patent Office’s brief in support of unpatentability of claims 10, 14, and 17	☒
1006	Canadian Patent Application No. 2,186,709 to McKenna	Invalidating prior art to the challenged claims	☒
1007	Corrected Amendment from Prosecution of ’074 Patent	Patent Owner’s purported distinctions over prior art	☒
1008	U.S.P.N. 5,485,161 to Vaughn	Invalidating prior art to the challenged claims	☒
1009	DE 197 55470 A1 to Tegethoff (German)	Invalidating prior art to the challenged claims	☒
1010	DE 197 55470 A1 to Tegethoff (English)	English translation of invalidating prior art to the challenged claims	☒
1011	Affidavit of Joyce Chen	Affidavit of Joyce Chen attesting to the accuracy of the translation of the prior art Tegethoff reference from German to English	☒
1012	U.S.P.N. 3,980,041 to Evans	Invalidating prior art to the challenged claims	☒

Exhibit	Description	Statement of Relevance	Filed
1013	U.S.P.N. 2,711,153 to Wendt	Invalidating prior art to the challenged claims	<input checked="" type="checkbox"/>

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.