IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the *Inter Partes* Review of: Trial Number: IPR2015-

U.S. Patent No. 8,896,447

Filed: April 16, 2014

Issued: November 25, 2014

Title: PROGRAMMABLE SECURITY SYSTEM Panel: To Be Assigned AND METHOD FOR PROTECTING

MERCHANDISE

Mail Stop Patent Board Patent Trial and Appeal Board P.O. Box 1450 Alexandria, VA 22313-1450 Panel:

PETITION FOR INTER PARTES REVIEW OF CLAIMS 1-12 and 15-24 OF U.S. PATENT NO. 8,896,447 PURSUANT TO 35 U.S.C. §§ 311-319 AND 37 C.F.R. § 42



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LIST OF EXHIBITS

| Exhibit No. | Description |
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| 1001 | WO/1997031347 A1 ("Cowell") |
| 1002 | U.S. Pat. No. 6,441,719 ("Tsui") |
| 1003 | U.S. Pat. No. 6,380,855 ("Ott") |
| 1004 | U.S. Pat. No. 5,650,774 ("Drori") |
| 1005 | U.S. Reissue 33,873 ("Romano") |
| 1006 | U.S. Pat. No. 5,942,985 ("Chin") |
| 1007 | U.S. Pat. No. 5,964,877 ("Victor") |
| 1008 | Declaration of Dr. Mitchell A. Thornton ("Declaration") |



I. MANDATORY NOTICES UNDER 37 C.F.R. § 42.8(A)(1)

The following mandatory notices are provided as part of this Petition.

A. Real Party-In-Interest Under 37 C.F.R § 42.8(B)(1)

The real parties-in-interest for this Petition are Hangzhou Langhong Technology Co., Ltd. and Langhong Technology USA Inc. (collectively, "Petitioner").

B. Related Matters Under 37 C.F.R § 42.8(B)(2)

U.S. Pat. No. 8,896,447 ("'447 patent") is presently the subject of the following patent infringement lawsuit brought on November 25, 2014 by InVue Security Products Inc. ("InVue" or "plaintiff") in U.S. District Court: *InVue Security Products, Inc. v. Hangzhou Langhong Technology Co., Ltd., et al.*, Case No. 3:14-cv-00654 in the Western District of North Carolina, Charlotte Division. The following are known pending administrative matters: application serial no. 14/306,761 and 14/529,516. Both of these applications claim the benefit of 60/753,908, filed December 23, 2005, which is the provisional application to which the '447 patent claims priority. Moreover, the following U.S. patents issued from respective applications that claim priority to 60/753,908: 8,884,762; 8,890,691; 7,969,305; and 7,737,846.

C. Lead and Backup Counsel Under 37 C.F.R. § 42.8(B)(3)

Petitioner provides the following designation of counsel:



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