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Paper No. \_\_\_\_

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TRW AUTOMOTIVE U.S. LLC

Petitioner

v.

MAGNA ELECTRONICS, INC.

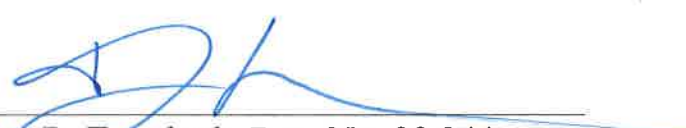
Patent Owner

Case IPR2015-00\_\_\_\_  
Patent 8,710,969

**PETITION FOR *INTER PARTES* REVIEW**

Respectfully submitted,

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## I. INTRODUCTION

Petitioner, TRW Automotive U.S. LLC (hereinafter “TRW”), seeks *Inter Partes* Review to invalidate claims 1-11, and 13-23 of unexpired U.S. Pat. No. 8,710,969 to DeWard et al. (the “‘969 Patent”) titled “ACCESSORY SYSTEM FOR VEHICLE,” which issued on April 29, 2014 and is attached as Exhibit 1002.<sup>1</sup>

The ‘969 Patent claims relate to a camera accommodated within an accessory module that detachably mounts to a mounting element attached on a windshield of an automobile for use within a driver assistance system. (1002-001 at Abstract). The camera includes a CMOS photosensor array housed within the accessory module separate from a lens.

The ‘969 Patent was filed on September 19, 2013 and claims priority back to a U.S. Provisional Application filed on August 18, 2004. (1002-001). The ‘969 Patent consistently incorporates U.S. Patent No. 6,824,281 by reference. (*See* 1002-018 at 3:62-67; -024 at 16:4-13). The ‘281 Patent does not qualify as prior art under §102(b) as it was not published more than one year before the 8/18/2004 priority date of the ‘969 Patent. (*see* 1006-001). While Magna Electronics Inc., (“Magna”) disclosed the non 102(b) prior art ‘281 Patent to the USPTO during prosecution of the ‘969 Patent, it *did not disclose its 102(b) prior art counterpart*

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<sup>1</sup> A full listing of all exhibits, per Rule 42.63(e) is provided as Exhibit 1001. Citations to exhibits are formatted as follows: “xxxx-yyy” with xxxx and yyy representing the exhibit number and page number respectively (with column, line, and/or paragraph numbers as appropriate).

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