

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LENOVO (UNITED STATES), INC.
Petitioner

v.

CRESWELL HOLDINGS LLC
patent Owner

Inter Partes Review No. _____

Patent No. 6,340,803

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 6,340,803

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EXHIBIT LIST

Exhibit No.	Description
1001	U.S. patent No. 6,340,803
1002	Declaration of Ted Selker
1003	Curriculum Vitae of Ted Selker
1004	U.S. patent No. 5,898,145 (“Su”)
1005	U.S. patent No. 5,850,194 (“Lin ’194”)
1006	U.S. patent No. 5,767,468 (“Tsai ’468”)
1007	U.S. Application No. 09/768,307 File History

I. INTRODUCTION

In accordance with 35 U.S.C. §§ 311-319 and 37 C.F.R. §§ 42.1-.80, 42.100-.123, *inter partes* review (“IPR”) is respectfully requested of claim 1 of United States patent No. 6,340,803, titled “Computer Keyswitch” (“the ’803 patent”), assigned to Creswell Holdings LLC (“Creswell” or “patent Owner”). (Ex. 1001).

The ’803 patent is related to a reduced height computer keyswitch that “has lower height but with same level mechanism height and structural strength” as prior art keyswitches. (*Id.* 1:41-43). The point of novelty is that the bottom plate 60 placed under the base 50 has a thickness that is less than the base 50, and that the pivotal shafts 33/43 are disposed in the through holes of the bottom plate and retained by the clamping plates 63/64 in order to reduce the overall height of the key. (*Id.* at 2:40-41 and 3:19-26).

The admitted prior art discloses a keyswitch with a base that is thicker than the bottom plate. (*Id.* at 1:32-34, Fig. 1). Further, the admitted prior art teaches that the pivotal shafts 17a/18a are disposed in the through holes of the bottom plate. The main difference between the admitted prior art and the claims of the ’803 patent is that in the admitted prior art, the clamping plates extend up from the base, whereas in the claims of the ’803 patent the clamping plates extend up from the bottom plate. But this configuration was well known in the prior art, as shown by the references cited in this petition.

II. MANDATORY NOTICES (37 C.F.R. §42.8(a)(1))

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