

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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TOYOTA MOTOR CORPORATION

Petitioner

Patent No. 5,732,375

Issue Date: March 24, 1998

Title: METHOD OF INHIBITING OR ALLOWING AIRBAG DEPLOYMENT

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**PETITION FOR *INTER PARTES* REVIEW  
OF U.S. PATENT NO. 5,732,375  
PURSUANT TO 35 U.S.C. § 312 and 37 C.F.R. § 42.104**

Case No. IPR2016-01382

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## EXHIBITS

Exhibit 1001	U.S. Patent No. 5,732,375 to Cashler
Exhibit 1002	U.S. Patent No. 5,474,327 to Schousek
Exhibit 1003	Japanese Unexamined Patent Application Publication JP 06-022939 to Tokuyama et al.
Exhibit 1004	English translation of Japanese Unexamined Patent Application Publication 06-022939 to Tokuyama et al. and associated translation declaration
Exhibit 1005	Excerpts from the File History of U.S. Patent No. 5,732,375 to Cashler
Exhibit 1006	Decision Denying Institution in Case IPR2015-01003
Exhibit 1007	Order re Claim Construction from <i>Signal IP v. American Honda Motor Co., Inc.</i> , No. 2:14-cv-02454 (C.D. Cal.)
Exhibit 1008	Joint Claim Construction and Prehearing Statement from <i>Signal IP v. American Honda Motor Co., Inc.</i> , No. 2:14-cv-02454 (C.D. Cal.)
Exhibit 1009	Expert Declaration of Scott Andrews
Exhibit 1010	Excerpt from Ex Parte Reexamination No. 90/013,386
Exhibit 1011	U.S. Patent No. 5,454,591 to Mazur et al.
Exhibit 1012	U.S. Patent No. 5,232,243 to Blackburn et al.
Exhibit 1013	Decision Denying Institution in Case IPR2016-00291
Exhibit 1014	Decision Denying Institution in Case IPR2016-00369
Exhibit 1015	Excerpt from Donald G. Fink, <i>Electronics Engineer's Handbook</i> , McGraw-Hill, Inc. (1975)

- Exhibit 1016 Japanese Unexamined Patent Application Publication JP 05-066166 to Tokuyama et al.
- Exhibit 1017 English translation of Japanese Unexamined Patent Application Publication 05-066166 to Tokuyama et al. and associated translation declaration

Pursuant to 35 U.S.C. §§ 311-319 and 37 C.F.R. Part 42, Toyota Motor Corporation (“Toyota” or “Petitioner”) respectfully requests *Inter Partes* Review (“IPR”) of claim 11 of U.S. Patent No. 5,732,375 (“the ’375 patent”), filed December 1, 1995 and issued March 24, 1998 to Robert Cashler, and assigned to Signal IP, Inc. (“Signal IP” or “Patent Owner”) (according to the U.S. Patent and Trademark Office (“USPTO”) assignment records).

For the reasons set forth below, there is a reasonable likelihood that Petitioner will prevail with respect to the claim challenged in this petition. In particular, as explained below, this petition and the supporting expert declaration include additional explanation and evidence about what one of ordinary skill in the art would have understood the prior art to disclose, which explanation and evidence the Board concluded was not presented in Toyota’s earlier petition that challenged claim 11 (in Case IPR2016-291).

**I. MANDATORY NOTICES (37 C.F.R. § 42.8)**

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

Petitioner Toyota, and its corporate subsidiaries Toyota Motor Sales U.S.A., Inc. and Toyota Motor North America, Inc. are the real parties-in-interest.

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

Claim 11 of the ’375 patent challenged in this Petition was previously challenged in two other petitions for IPR. The first petition was filed by Petitioner Toyota in Case IPR2016-291; the second petition was filed by Aisin Seiki Co. Ltd.

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