

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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ONE WORLD TECHNOLOGIES, INC.  
D/B/A TECHTRONIC INDUSTRIES POWER EQUIPMENT,  
Petitioner,

v.

THE CHAMBERLAIN GROUP, INC.,  
Patent Owner.

Case No. IPR2017-00432

Patent No. 7,339,336

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**PETITION FOR *INTER PARTES* REVIEW OF**

**U.S. PATENT NO. 7,339,336**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

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## EXHIBIT LIST

<b>EXHIBITS FILED BY PETITIONER</b>	
Ex. 1001	U.S. Patent No. 7,339,336 (“the ’336 patent”)
Ex. 1002	File History for U.S. Patent No. 7,339,336
Ex. 1003	Declaration of Stuart Lipoff Regarding U.S. Patent No. 7,339,336
Ex. 1004	U.S. Patent No. 6,326,751 to Mullet et al. (“Mullet”)
Ex. 1005	U.S. Patent No. 5,278,480 to Murray (“Murray”)
Ex. 1006	Revised Joint Claim Construction Chart filed November 11, 2016 in <i>In the Matter of Certain Access Control Systems and Components Thereof</i> , ITC Investigation No. 337-TA-1016.
Ex. 1007	<i>Curriculum Vitae</i> of Stuart Lipoff

## **I. INTRODUCTION**

Petitioner One World Technologies, Inc. requests *Inter Partes* Review (“IPR”) of claims 1, 7, 11-13, and 15 (the “Challenged Claims”) of U.S. Patent No. 7,339,336 to Eric M. Gregori et al. (“the ’336 patent,” Ex. 1001), purportedly owned by The Chamberlain Group, Inc. (“Patent Owner”).

The ’336 patent relates to monitoring and adjusting the force used by movable barrier operators, like automated garage door openers, during operation. The ’336 patent discloses methods for automatically and continuously calculating and adjusting an excess force threshold value, which is a value used to identify when too much force is being applied by a movable barrier operator. The constant adjustment of the force threshold allows the operator to accommodate for changing environmental conditions over time, such as for the wear and tear of the movable barrier system. For example, more force may be required to open the garage door when the system is old as compared to when it was new.

The ’336 patent, however, admits that manually setting an excess force threshold value and calculating such a value during a learning mode were well known. Ex. 1001 at 1:54-65 (“[M]any movable barrier operators have a user-adjustment interface ... that a user or installer can manipulate to adjust allowed applied force during one or more directions of barrier travel. ... Another solution has been to provide a learning mode during which a movable barrier operator can

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