

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COOPER CROUSE-HINDS, LLC,
Petitioner

v.

CMP PRODUCTS LIMITED,
Patent Owner.

Case No.: IPR2018-00994

U.S. Patent No. 8,872,027

**PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 8,872,027**

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Cases	
<i>In re Am. Acad. Of Sci. Tech Ctr.</i> , 367 F.3d 1359 (Fed. Cir. 2004)	21
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<i>Chore-Time Equip., Inc. v. Cumberland Corp.</i> , 713 F.2d 774 (Fed. Cir. 1983)	6
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<i>Pentec, Inc. v. Graphic Controls Corp.</i> , 776 F.2d 309 (Fed. Cir. 1985)	53
<i>Randall Mfg. v. Rea</i> , 733 F.3d 1355 (Fed. Cir. 2013)	6
<i>In re Translogic Tech., Inc.</i> , 504 F.3d 1249 (Fed. Cir. 2007)	21
Statutes	
35 U.S.C. § 103(a)	<i>passim</i>
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Other Authorities	
37 C.F.R. § 42.8(b)(1).....	3
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37 C.F.R. § 42.104(a).....	4
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