UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

BMW OF NORTH AMERICA, LLC,

Petitioner

v.

CARRUM TECHNOLOGIES, LLC,

Patent Owner

Case No. IPR2019-00927

Patent No. 7,512,475

Title: AUTOMATIC LATERAL ACCELERATION LIMITING AND NON THREAT TARGET REJECTION



TABLE OF CONTENTS

I.	PRE	PRELIMINARY STATEMENT					
II.	OVERVIEW OF THE '475 PATENT						
	A. Specification						
	B.	Pros	ecution History	6			
	C.	Pers	on of Ordinary Skill in the Art	9			
III.	CLA	AIM C	ONSTRUCTION	9			
IV.		STATEMENT OF PRECISE RELIEF REQUESTED FOR EACH CLAIM CHALLENGED					
V.	CLAIMS 1-12 OF THE '475 PATENT ARE UNPATENTABLE OVER THE OTHER PRIOR ART						
	A.	Ground 1: Claims 1, 2, 3, and 5 Are Obvious over <i>Winner</i> in view of <i>Fukada</i>					
		1.	The Art	11			
		2.	Claim 1	13			
		3.	Claim 2	19			
		Clai	m 3	21			
		4.	Claim 5	22			
	B.	Ground 2: Claim 4 Is Obvious over <i>Winner</i> in View of <i>Fukada</i> and <i>Schmitt</i>					
		1.	The Art	23			
		2.	Claim 4	24			
	C.		and 3: Claims 6 and 7 Are Obvious over <i>Winner</i> in view of ada	25			
		1.	Independent Claim 6	26			



		2.	Claim 7	32		
	D.	Ground 4: Claims 8 and 9 Are Obvious over <i>Winner</i> in View of <i>Fukada</i> and <i>Schmitt</i>				
		1.	Claim 8	34		
		2.	Claim 9	35		
	E.		nd 5: Claims 10 to 12 Are Obvious over <i>Winner</i> in View <i>kada</i> and <i>Khodabhai</i>	37		
		1.	The Art	38		
		2.	Claim 10	41		
		3.	Claim 11	43		
		4.	Claim 12	44		
VI.	MANDATORY NOTICES UNDER 37 C.F.R. §42.84					
	A.	Real	Party-in-Interest	44		
	B.	Related Matters44				
	C.	Lead	and Backup Counsel, and Service Information	45		
VII.	GRO	UNDS	FOR STANDING	46		
VIII.	CER	TIFIC	ATION UNDER 37 C.F.R. §42.24(D)	46		
IX	CON		ION	10		



LIST OF EXHIBITS

	U.S. Patent No. 7,512,475 to Robert A. Perisho, Jr., and Jeremy
F., h; h; 4 1001	S. Greene, titled "Automatic Lateral Acceleration Limiting and
Exhibit 1001	Non Threat Target Rejection," filed on May 19, 2004, and issued
	on March 31, 2009 ("the '475 patent").
Exhibit 1002	File History of U.S. Patent No. 7,512,475.
EL:L:4 1002	Expert Declaration of Azim Eskandarian, D.Sc. in Support of
Exhibit 1003	Petition for <i>Inter Partes</i> Review of U.S. Patent No. 7,512,475.
Exhibit 1004	U.S. Patent No. 6,456,924 to Schmitt ("Schmitt")
E-h:h:4 1005	U.S. Patent Application Publication No. 2002/0165657 to
Exhibit 1005	Winner and Lueder ("Winner")
Exhibit 1006	U.S. Patent No. 5,627,756 to Fukada ("Fukada")
Exhibit 1007	U.S. Patent No. 5,959,569 to Khodabhai ("Khodabhai")
Exhibit 1008	Excerpt of RULES OF THE ROAD, ILL. DMV (2001)



I. PRELIMINARY STATEMENT

Petitioner BMW of North America, LLC requests *Inter Partes* Review ("IPR") of claims 1-12 of U.S. Patent No. 7,512,475 ("Challenged Claims"), assigned to Patent Owner Carrum Technologies, LLC. The Challenged Claims are directed to a vehicle equipped with an adaptive cruise control ("ACC") system that provides control in turning situations by limiting lateral acceleration during the vehicle turn, Ex. 1001, 2:47-50, something that was well known before the earliest claimed priority date of the '475 patent. Indeed, the subject matter of the Challenged Claims is expressly disclosed and/or rendered obvious by the art submitted in this Petition.

Independent claims 1 and 6 recite methods of controlling a vehicle having an ACC system. Ex. 1001, 8:7-51. The ACC system monitors the speed of the equipped vehicle and decreases the vehicle's speed when the vehicle is in a turn or an object is in the same lane as the vehicle. *Id.* But this concept was well known before the '475 patent was filed. For example, *Winner* discloses an ACC system capable of detecting the location of an object in a turn and determining whether the object is located within the path of the host vehicle, and reducing the vehicle's speed if the object is within the path. *Winner*, ¶ 0008; *id.*, Fig. 1. Furthermore, *Fukada* discloses a vehicle controller that reduces the occurrence of vehicle loss of control during a turn as the result of excessive lateral acceleration. *Fukada*, 1:6-



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