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Paper 16
Date: January 21, 2022

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

VOLKSWAGEN GROUP OF AMERICA, INC.,

Petitioner,

v.

ARIGNA TECHNOLOGY LIMITED,

Patent Owner.

IPR2021-01263
Patent 7,397,318 B2

Before GARTH D. BAER, SHARON FENICK, and IFTIKHAR AHMED, *Administrative Patent Judges*.

AHMED, *Administrative Patent Judge*.

DECISION
Denying Institution of *Inter Partes* Review
35 U.S.C. § 314

I. INTRODUCTION

Volkswagen Group of America, Inc. ("Volkswagen") filed a Petition (Paper 2, "Pet.") requesting *inter partes* review of claims 1 and 2 ("challenged claims") of U.S. Patent 7,397,318 B2 (Ex. 1001, "the '318 patent"). Arigna Technology Limited ("Patent Owner" or "Arigna") filed a Preliminary Response. Paper 8 ("Prelim. Resp."). We authorized additional briefing to address a potentially dispositive issue raised in the Preliminary Response, namely, whether Conti Temic Microelectronic GmbH and its wholly-owned subsidiary ADC Automotive Distance Control Systems GMBH (collectively, "Conti") are real parties in interest to this proceeding. Paper 9. Volkswagen then filed a Reply to Patent Owner's Preliminary Response (Paper 10, "Reply") and Patent Owner filed a Sur-reply to Volkswagen's Reply (Paper 11, "Sur-reply") on that issue.

For reasons that follow, we find that Conti (Volkswagen's supplier and indemnifier) is a real party in interest to this proceeding. Because Conti filed a civil action seeking a declaration of invalidity of the '318 patent claims prior to Volkswagen's filing of the Petition, *Conti Temic Microelectronic GmbH et al v. Arigna Technology Limited*, No. 1:21-cv-00826 (E.D. Va. filed July 14, 2021) ("the Virginia Declaratory Judgment Action"), we deny the Petition and do not institute review. 35 U.S.C. § 315(a)(1) (The Board is prohibited from instituting review "if, before the date on which the petition for such a review is filed, the petitioner or real party in interest filed a civil action challenging the validity of a claim of the patent.").

II. DISCUSSION

A. Background and Timeline

Conti supplies radar sensor modules to Volkswagen for use in Volkswagen's vehicles. Prelim. Resp. 1, 24 (citing Ex. 2007 (Conti's Complaint in the Virginia Declaratory Judgment Action)).

On February 18, 2021, Patent Owner filed a district court action against Volkswagen in the Eastern District of Texas, asserting that Volkswagen's vehicles that incorporate the NXP Semiconductors MR2001 chip package infringe the '318 patent claims.[1] *Arigna Technology Limited v. Volkswagen AG*, No. 2:21-cv-00054 (E.D. Tex.) ("the Texas Infringement Action"); Pet. 84; Prelim. Resp. 24 (citing Ex. 2006 (Complaint in the Texas Infringement Action[2])).

Almost five months after the Texas Infringement Action had been filed, on July 14, 2021, Conti filed the Virginia Declaratory Judgment Action, naming Conti Temic Microelectronic GmbH and ADC Automotive Distance Control Systems GMBH as plaintiffs and Arigna as defendant. Pet. 84; Prelim. Resp. 24 (citing Ex. 2007). Conti's lawsuit asserted that "[a]n actual controversy exists with respect to the '318 Patent due at least to [Arigna's] assertion that [Conti's] Customers infringe claims 1 and 2 of the '318 Patent through their sale of vehicles containing [Conti's] ARS4-Series radar sensor modules containing the NXP MR2001." Prelim. Resp. 24

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[1] The '318 patent, titled "Voltage-Controlled Oscillator," issued July 8, 2008. Ex. 1001, code (45).

[2] Arigna sued both Volkswagen of America and Volkswagen AG, and the complaint collectively refers to the two related entities as "Volkswagen." Ex. 2006 ¶¶ 3, 4; *see also* Pet. 84.

(quoting Ex. 2007 ¶ 26). Two days after Conti filed the Virginia Declaratory Judgment Action, Volkswagen filed this Petition. Paper 3, 1 (reflecting a filing date for the Petition of July 16, 2021). Patent Owner then added Conti as a party to the Texas Infringement Action. Prelim. Resp. 24 (citing Ex. 2008 (Second Amended Complaint in the Texas Infringement Action), 1).

The Petition identifies only Volkswagen, a wholly-owned subsidiary of Volkswagen AG, as a real party in interest to this administrative review of the '318 patent claims—the very same claims at issue in both the Texas Infringement Action and the Virginia Declaratory Judgment Action. Pet. 84. Patent Owner responds that the relationship between Volkswagen and Conti establishes that Conti is a real party in interest to this review. Prelim. Resp. 1–2, 22–32. On that basis, Patent Owner argues, the Petition must be denied under Section 315(a)(1), which prohibits institution of review where the petitioner, or real party in interest, files a civil action challenging the validity of a claim of the patent prior to the filing date of a petition seeking an *inter partes* review of that patent. *Id*. at 2, 22–23.

B. Related Proceedings

The parties identify as related the two civil actions discussed above, involving the '318 patent. Pet. 84 (citing the Texas Infringement Action and the Virginia Declaratory Judgment Action); Paper 7, 1 (citing those same two civil actions). There is also a pending *ex parte* reexamination proceeding (No. 90/019,015) relating to the '318 patent pending before the Office. Paper 7, 1.

C. The Statutory Bar

"An inter partes review may not be instituted if, before the date on which the petition for such a review is filed, the petitioner *or real party in interest* filed a civil action challenging the validity of a claim of the patent." 35 U.S.C. § 315(a)(1) (emphasis added). Conti has a business relationship with Volkswagen whereby it supplies radar sensor modules to Volkswagen under an agreement that includes provisions relating to indemnification, and Volkswagen has sought indemnification against Patent Owner's infringement claims based on the agreement. Ex. 2007 ¶¶ 3, 15, 22 (Complaint filed in the Virginia Declaratory Judgment Action). Given that Conti filed (prior to Volkswagen's filing of the Petition) a civil action challenging the validity of the claims of the '318 patent, Conti is barred under 35 U.S.C. § 315(a)(1). Thus, a dispositive question, fully briefed by the parties, is whether Conti is a real party in interest to this proceeding. For reasons provided in our analysis below, we answer that question in the affirmative.

D. The Real Party in Interest Inquiry Requires a "Flexible Approach"

A petitioner is required to identify all of the real parties in interest in a petition requesting *inter partes* review. 35 U.S.C. § 312(a)(2). The Board generally accepts a petitioner's initial identification of the real parties in interest unless the patent owner presents some evidence to support an argument that an unnamed party should be included. *See Worlds Inc. v. Bungie, Inc.*, 903 F.3d 1237, 1242 (Fed. Cir. 2018) (explaining that, in an *inter partes* review, the "petitioner's initial identification of the real parties in interest should be accepted unless and until disputed by a patent owner," and that "a patent owner must produce some evidence to support its

argument that a particular third party should be named a real party in interest"). Furthermore, a petitioner bears the burden of persuasion to demonstrate that it has identified all of the real parties in interest. *Id*. at 1242−43. That burden never shifts to the patent owner. *Id.* at 1243−44.

Our reviewing court has instructed us to apply a "flexible approach" to the real party in interest inquiry, which turns on "equitable and practical considerations" bearing on whether an unnamed entity has "a preexisting, established relationship with the petitioner." *Applications in Internet Time, LLC v. RPX Corp*., 897 F.3d 1336, 1351 (Fed. Cir. 2018). The real party in interest inquiry, thus, "is a highly fact-dependent question" with no "bright line test," which the Board assesses "on a case-by-case basis." Patent Trial and Appeal Board Consolidated Trial Practice Guide (Nov. 2019) ("TPG"), 12–18, *available at* https://www.uspto.gov/sites/default/files/documents/tpgnov.pdf.

Applying the Federal Circuit's guidance in *Applications in Internet Time*, the Board has further set forth factors (the "*AIT Remand* factors") to be considered in determining whether an unnamed party is a real party in interest, including (1) the petitioner's business model, (2) the petitioner's explanation of its own interest in the IPR, (3) whether the petitioner takes the unnamed party's interests into account when determining whether to file the IPR petition, (4) the unnamed party's relationship with petitioner, (5) the unnamed party's interest in and benefit from the IPR, (6) whether the petitioner can be said to be representing that interest, (7) whether the unnamed party actually desired review of the challenged patent, (8) the relevance of any overlap in board members between the petitioner and the unnamed party, and (9) evidence of communications between the petitioner

and the unnamed party. *RPX Corp. v. Applications in Internet Time, LLC*, IPR2015-01750, Paper 128 at 10–11 (PTAB Oct. 2, 2020) (precedential) ("*AIT Remand*").

We find that the manner in which Volkswagen and Conti cast their relationship in the related civil actions, including the activities alleged to infringe the '318 patent, supports a finding that Conti is a real party in interest to this proceeding. We first address Conti's relationship with Volkswagen and Conti's interest in this IPR, then turn to Volkswagen's arguments on each of the *AIT Remand* factors. *AIT Remand*, Paper 128 at 10–11; *Applications in Internet Time*, 897 F.3d at 1351.

E. The Civil Actions Demonstrate that Conti Is a Real Party in Interest to this Proceeding

Patent Owner comes forward with compelling evidence that Conti is a real party in interest to this proceeding. In filing the Virginia Declaratory Judgment Action seeking to invalidate the '318 patent claims, Conti asserted that it is the *sole* real party in interest to the Texas Infringement Action. Prelim. Resp. 24–25 (citing Ex. 2007 ¶¶ 26, 41); Reply 1 ("Conti correctly asserted that it should have been the sole Texas defendant because it supplies the part that includes the accused chip.") (citing Ex. 2007 ¶¶ 3, 14–24; Ex. 2008, 7–8, 15). Specifically, Conti alleged that Patent Owner had not identified or accused, in the Texas Infringement Action, any product other than Conti's ARS4-Series radar sensor modules containing the NXP MR2001 as infringing the '318 patent and that Conti was obligated to indemnify and defend Volkswagen against Patent Owner's claims under agreements that it has with Volkswagen relating to the manufacture and

supply of the ARS4-Series radar sensor modules for use in Volkswagen's vehicles. *See* Ex. 2007 ¶¶ 21, 22.

Conti next filed a motion to stay the Texas Infringement Action, stating to that court that Conti, not Volkswagen, is the real party in interest and that Conti is the "true defendant" against Arigna's claims as to the '318 patent. Prelim. Resp. 25 (citing Ex. 2009, 8, 10, 15). Specifically, Conti told the Texas court that "as the sole manufacturer and provider of the ARS4-Series radar sensor modules, Conti is the real party in interest with respect to the allegations against the Customers."[3] Ex. 2009, 8; *see also id.* at 10 ("as to the '318 Patent as Conti is the 'true defendant'"), 12 ("Conti is the sole supplier of Conti's ARS4-Series radar sensor modules and, as such, the sole supplier of the NXP MR2001 chip in the Customer's vehicles."), 15 ("The '318 Patent claims against all the defendants should be stayed as doing so would . . . allow the real party in interest, true defendant, and first filer to defend against Arigna's claims."). Conti further argued to that court that "[e]ven if Arigna prevails on its claims against Conti, Arigna still could not collect from the Customers, as Arigna would be limited to a single recovery from Conti which would, under the doctrine of exhaustion, result in the Customers being authorized to use Arigna's patents." Ex. 2012, 2; *see also id.* at 5 ("as confirmed by the Customers, Conti is their sole supplier of the radar module containing the NXP MR2001 chip").

Patent Owner asserts that "Volkswagen expressly joined Conti's motion to stay, thereby adopting Conti's argument that Conti (and not

[3] Conti refers to all vehicle manufacturers that are defendants in the Texas Infringement Action, including Volkswagen, as "Customers." Ex. 2009, 1 n.3.

Volkswagen) is the real party in interest to the '318 Patent proceedings." Prelim. Resp. 25 (citing Ex. 2010 (Volkswagen AG and Volkswagen Group of America, Inc.'s notice of joinder in the motion to stay), 1).

Those statements, made to two different district courts, standing alone, persuade us that Conti is a prime beneficiary of the Petition (and, thus, support that Conti is a real party in interest to the instant dispute), which involves challenges against the same patent claims at issue in both civil actions.

Volkswagen contends that "Conti's assertions were correct for *alleged infringement* of the '318 patent. But they do not render it an RPI here." Reply 1 (citing *Global Equity Mgmt. (SA) Pty. Ltd. v. eBay Inc.*, 798 F. App'x 616, 620 (Fed. Cir. 2020)) (emphasis added). Similarly, Volkswagen argues that it "bound itself to Conti's DJ suit for findings of infringement, not invalidity." *Id.* at 2 (citing Ex. 2010, 2 (stating that Volkswagen does not agree to be bound by findings on the issue of validity in the Conti Action)). In essence, Volkswagen invites us to decide that assertions related to real party in interest made to two different district courts on the claims of the challenged patent should be confined to infringement of those claims and have no relevance to the real party in interest inquiry here. We decline.

First, Conti's statements to both courts were not limited in any way. Conti argued to both courts that it was *the* real party in interest as to *all* claims relating to the '318 patent, i.e., both infringement and invalidity. *See, e.g.*, Ex. 2009, 15; Ex. 2007 ¶¶ 26, 41. Nothing in the record indicates that Volkswagen ever disputed Conti's assertions as to real party in interest relating to the '318 patent in the district courts. Volkswagen's contention

that, in joining Conti's motion to stay, it only "bound itself to Conti's DJ suit for findings of infringement, not invalidity" (*see* Ex. 2010, 2), is in fact contradicted by Conti's *broader* representation to the Texas court that "*all Customers* have now agreed to be bound *with respect to* the Virginia action," which Conti made *after* Volkswagen's joinder of Conti's motion to stay. *See* Ex. 2012, 5 (emphasis added). Given that Volkswagen joined Conti's motion seeking a stay of the Texas Infringement Action pending Conti's declaratory judgment action on the *validity* of the '318 patent, Volkswagen's statement to the district court to be bound only as to infringement appears to be an attempt to preserve a colorable argument that it was not statutorily barred (by Conti's filing of the Virginia Declaratory Judgment Action) from filing the instant Petition.

Secondly, Volkswagen offers little authority to support its proposed distinction between invalidity and infringement on real party in interest determinations as to claims of the same patent. In *Global Equity*, the only authority cited by Volkswagen, the Federal Circuit found Patent Owner's real party in interest argument waived, and even if not waived, found that petitioners at the Board were *not* customers of (and did not use technology from) Amazon, the party that had filed an invalidity declaratory judgment action before the *inter partes* review was filed. *See Global Equity*, 798 F. App'x at 617–21. Here, there is no dispute that Volkswagen uses Conti's products, and in fact, that Conti is the only supplier of the accused products and indemnifies Volkswagen.[4] The facts here are more closely aligned with

[4] Volkswagen does not dispute Conti's claims that Volkswagen is completely indemnified by Conti against Patent Owner's claims. We agree with Patent Owner that the fact that Volkswagen has not produced its

the Board's precedential decision in *Ventex Co. Ltd. v. Columbia Sportswear North America, Inc.*, which similarly involved two parties, Ventex and Seirus, that had a customer-supplier relationship, with agreements between them that required one to indemnify the other. IPR2017-00651, Paper 148 at 8 (PTAB Jan. 24, 2019) (precedential). The Board there held that "the parties had mutual interest in the continuing commercial and financial success of each other," and that "the subject of the two contracts between the parties—material that [was] the subject of infringement allegations tied to the '119 and '270 patents—incentivizes both parties to invalidate claims of the '119 and '270 patents." *Id.* In that sense, the Board reasoned, "Seirus is a clear beneficiary of Ventex's efforts in this *inter partes* review, and it follows readily that Ventex represents Seirus's interests in this proceeding." *Id.* Here too, Conti is the entity whose activities give rise to potential infringement liability under the '318 patent claims, and is therefore, a clear beneficiary of Volkswagen's efforts in this *inter partes* review.

Moreover, this case implicates principles of fairness in forum selection. *See* Sur-reply 4. Where Conti was able to challenge the validity of the '318 patent in its chosen forum and request stay of the Texas Infringement Action against Volkswagen based on several broad assertions to both courts casting Conti as the *sole* real party in interest as to the patent and contending that all its customers were bound by the resolution of its Virginia Declaratory Judgment Action, it seems fair to bar Volkswagen

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agreement with Conti may suggest that the agreement does not support Volkswagen in meeting its burden regarding the identification of all real parties in interest. *See Worlds*, 903 F.3d at 1242−43.

(Conti's customer and indemnitee) from asserting a challenge against the same claims in this forum. 35 U.S.C. § 315(a)(1).

Given the above circumstances, we are persuaded that "both equitable and practical considerations" favor a finding that Conti is "a clear beneficiary that has a preexisting, established relationship with" Volkswagen. *Applications in Internet Time*, 897 F.3d at 1351. Applying a "flexible approach" to the real party in interest inquiry, and considering all of the *AIT Remand* factors (discussed below), we find that Conti is a real party in interest to this proceeding. *Id.*

F. Volkswagen's Arguments on the AIT Remand *Factors*

Under the first *AIT Remand* factor, Volkswagen argues that "it sells automobiles—its business model does not include filing IPRs on behalf of others." Reply 1 (citing *AIT Remand*, at 11–15). Volkswagen contends that because Conti was not accused of infringement until after the Petition was filed, Volkswagen had and continues to have significant interest in this proceeding under the second *AIT Remand* factor. *Id.* (citing *AIT Remand*, at 15–17). According to Volkswagen, it has its own significant incentive to invalidate the patent because Patent Owner has sought discovery of Volkswagen's entire vehicle sales, not just of the accused subcomponent chip. *Id.* (citing Ex. 1029, 2, 8–10).

As discussed above, Volkswagen and Conti have a mutual interest in each other's success and that mutual interest supports our conclusion that Conti is a real party in interest. The fact that Volkswagen, although indemnified, may still have an interest in invalidating the '318 patent does not mitigate the fact that Conti would also be a clear beneficiary of the Petition. In fact, given that Conti has many customers other than

Volkswagen for the accused sensors and indemnifies them as well, it appears that Conti is the predominant beneficiary here. There may be multiple real parties in interest to a proceeding, and a petitioner for *inter partes* review must disclose each one. On that point, the Federal Circuit has instructed that the statute that gives rise to the bar "does not presume the existence of only one real party in interest–it is not an either-or proposition." *Applications in Internet Time*, 897 F.3d at 1353.

Under the third and sixth *AIT Remand* factors, Volkswagen contends it represents its own interests, not Conti's, and it is Volkswagen that "bore the entire expense of preparing the Petition while receiving no input from Conti—no direction, control, monetary contribution, or subject matter contribution." Reply 2–3 (citing Ex. 1028 ¶¶ 2–3). Patent Owner responds Volkswagen, while purportedly having no liability for infringement of the '318 patent, took Conti's interests into account by filing the IPR that Conti itself could not file, thereby allowing Conti and Volkswagen to jointly mount parallel attacks on the validity of the '318 patent in multiple forums. Prelim. Resp. 28. As discussed above, we are persuaded that Volkswagen did take Volkswagen and Conti's mutual interests into account in filing the Petition. Moreover, unlike in *AIT Remand*, where petitioner was a defensive patent aggregation entity, the issues of control and funding, in this case, carry less weight in view of the evidence of Conti/Volkswagen's assertions to the two district courts, the nature of their relationship, and the degree to which Conti stands to benefit from Volkswagen's filing of the Petition.

On the fourth and eighth *AIT Remand* factors, Volkswagen contends that Conti is an unrelated company, and Volkswagen's relationship with Conti is one of an arms-length customer, with no overlap in control or

direction. Reply 3 (citing Ex. 1028 ¶ 6; Exs. 1030–1032). A common interest, Volkswagen argues, is not evidence that Volkswagen and Conti collaborated on the Petition. *Id.* at 3–4 (citing *Nichia Corp. v. Emcore Corp.*, IPR2012-00005, Paper 68 at 4–5 (PTAB Feb. 11, 2014)). Patent Owner contends the joint defense and/or common interest agreement between Volkswagen and Conti regarding the Texas Infringement Action "further demonstrat[es] the close relationship between the parties." Prelim. Resp. 29 (citing Ex. 2019, 14 n.3). We agree. Although a litigation-based joint defense/common interest agreement alone is insufficient to show collaboration, there exists a business relationship between Volkswagen and Conti that is defined by mutual legal obligations and commonality of interest. *See* TPG 17–18. Conti is Volkswagen's *sole* supplier of the radar sensor modules that are used in Volkswagen's vehicles and that are accused of infringement of the '318 patent. Volkswagen and Conti are both well aware of the potential risks that Patent Owner's claims pose to each of their businesses and have a common interest in invalidating the '318 patent. *See AIT Remand*, Paper 128 at 22. The totality of the circumstances here calls into considerable question Volkswagen's assertion that there has been no collaboration with Conti on issues related to this proceeding.

On the fifth and seventh *AIT Remand* factors, Volkswagen argues that "all defendants have an interest in and will benefit from the Petition—but they are not [real parties in interest]," and that "Conti elected a different avenue for challenging the patent before the Petition in its DJ suit." Reply 4 (citing Ex. 1028 ¶¶ 4–5). Although Conti elected to challenge validity of the '318 patent in the Virginia action, as discussed above, it stands to benefit greatly from the invalidation of the '318 patent claims in this proceeding.

Prelim. Resp. 29–30; *see also* Ex. 2007 ¶¶ 3, 15, 21 (asserting that Conti is the sole supplier of the accused sensors to over a dozen car manufacturers accused of infringement of the '318 patent, and that the Texas Infringement Action "has placed a cloud over [Conti's] continuing manufacture and sale of its radar sensor modules"). And unlike the other defendants, Conti is the only one with a business relationship with Volkswagen that involves products implicated by Patent Owner's claims as to the '318 patent.

For the ninth *AIT Remand* factor, Volkswagen argues that mere "coordination in the ongoing litigation" and a common-interest privilege between Volkswagen and Conti "fails to show any contribution, control, or input on the Petition." Reply 4 (citing Ex. 1028 ¶¶ 2–5).

Even if Volkswagen and Conti "did not directly discuss filing an IPR, the discussions of litigation are naturally tied to possible defenses, of which an IPR challenge is one." *AIT Remand*, Paper 128 at 30 (explaining that "[s]uch communications need not expressly involve a request by [unnamed RPI] Salesforce for [petitioner] RPX to file an IPR petition," and that "[t]he discussion of pending litigation by [patent owner] AIT against Salesforce . . . would weigh in favor of finding that Salesforce was an interested party"). For example, Volkswagen's asserted grounds in this proceeding are the very *same* grounds that Volkswagen and Conti *jointly* present as part of their invalidity contentions in the Texas Infringement Action. *See* Prelim. Resp. 63–64 (citing Ex. 2015, 5–10, Ex. 2016–2018); Pet. 3. Volkswagen does not assert that it had no discussions with Conti as to these invalidity defenses in the Texas action. Further, Conti's assertions in the Virginia Declaratory Judgment Action indicate that it did at least discuss the Texas Infringement Action with Volkswagen well before Conti filed the Virginia Declaratory

Judgment Action or Volkswagen filed the Petition. As Patent Owner points out, the Volkswagen's communications with Conti concerning the '318 patent are covered by a common interest privilege. Prelim. Resp. 31 (citing Ex. 2019 at 14 n.3). The totality of circumstances here suggests a coordinated strategy for defending against Patent Owner's claims relating to the '318 patent.

On this record, we find that Volkswagen and Conti "have a 'mutual interest in the continuing commercial and financial success of each other'" and both are incentivized to challenge the '318 patent claims. *Ventex*, Paper 148 at 7–8. Accordingly, both Volkswagen and its supplier Conti are real parties in interest to this administrative proceeding. We deny the Petition because Conti previously filed a civil action challenging the validity of the '318 patent claims. 35 U.S.C. § 315(a)(1).

III. CONCLUSION

Conti is a real party in interest to this proceeding. Because Conti filed a civil action seeking a declaratory judgment of invalidity of the '318 patent claims prior to the filing of the Petition, we *deny* the Petition and do not institute an *inter partes* review. 35 U.S.C. § 315(a)(1). Nothing in this Decision should be construed as an assessment of the merits of any ground of unpatentability asserted in the Petition.

IV. ORDER

It is

ORDERED that the Petition is *denied* and no *inter partes* review is instituted.

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