

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TESLA, INC.,
Petitioner,

v.

INTELLECTUAL VENTURES II LLC,
Patent Owner.

IPR2025-00342
Patent 7,336,805 B2

Before KRISTEN L. DROESCH, SCOTT A. DANIELS, and
FREDERICK C. LANEY, *Administrative Patent Judges*.

DANIELS, *Administrative Patent Judge*.

FINAL WRITTEN DECISION
Determining No Claims Unpatentable
Denying Patent Owner's Request to Vacate Institution Decision
35 U.S.C. § 318(a)

I. INTRODUCTION

Tesla, Inc., (“Tesla” or “Petitioner”) filed a Petition requesting *inter partes* review (“IPR”) of claims 1, 2, and 6–11 of U.S. Patent No. 7,336,805 B2 (Ex. 1001, “the ’805 patent”). Paper 2 (“Pet.”). Intellectual Ventures II LLC (“IV” or “Patent Owner”) filed a Request for Discretionary Denial. Paper 7 (“Request”). Patent Owner also filed a Preliminary Response to the Petition. Paper 8. Petitioner filed an Opposition to Patent Owner’s Request. Paper 9. On July 2, 2025, the Acting Director of the United States Patent and Trademark Office issued a Decision denying Patent Owner’s Request resolving the discretionary denial issues. Paper 10.

We instituted an *inter partes* review of claims 1, 2, and 6–11 of the ’805 patent on all of the grounds asserted by Petitioner. Paper 13 (“Dec. Inst.”). Patent Owner timely filed a Patent Owner Response. Paper 16 (“PO Resp.”). Petitioner subsequently filed a Reply (Paper 23, “Pet. Reply”), and Patent Owner timely filed a Sur-Reply to Petitioner’s Reply (Paper 26, “PO Sur-Reply”).

In addition, Patent Owner filed a Supplemental Patent Owner Response. Paper 20 (“Supp. PO Resp.”). Petitioner filed a Reply to Patent Owner’s Supplemental Response. Paper 21.

Oral argument was held on April 23, 2026, at USPTO Headquarters in Alexandria, VA and a transcript of the hearing is entered in the record. Paper 31.

We have jurisdiction under 35 U.S.C. § 6(b). This Final Written Decision is issued pursuant to 35 U.S.C. § 318(a). Having reviewed the arguments of the parties and the supporting evidence, we find that Petitioner

has not demonstrated by a preponderance of the evidence that each of the challenged claims 1, 2, and 6–11 of the '805 patent is unpatentable.

II. BACKGROUND

A. Related Matters

The parties identify the following district-court proceedings involving the '805 patent and related patents: *Intellectual Ventures II LLC v. Tesla, Inc.*, No. 1-24-cv-00390 (W.D. Tex. April 11, 2024); *Intellectual Ventures II LLC v. Tesla, Inc.*, No. 6-24-cv-00188 (W.D. Tex. April 12, 2024); *Intellectual Ventures II LLC v. Tesla, Inc.*, No. 1-24-cv-00884 (W.D. Tex. April 12, 2024). Pet. 86; Paper 3.

B. Real Parties in Interest

Petitioner and Patent Owner each identifies itself as the real party in interest. Pet. 86; Paper 3 (Patent Owner's Mandatory Notices).

C. The '805 patent

The '805 patent is titled “Docking Assistant” and relates to a method for “detecting the potential target objects in the image data of an image sensor and identifying the potential target objects as potential destinations in a multi-stage exclusionary method” and computing “a trajectory describing an optimized travel path.” Ex. 1001, codes (54), (57). The specification describes that the invention “functions without the need for affixing specific visual signatures at the destination.” *Id.* at 2:19–20.

According to the specification, image data is first recorded and then processed. *Id.* at 4:20–35. Processing includes edge detection and segmentation, such that extracted edges and segments are “stored in a hierarchically organized tree structure in the image data.” *Id.* at 4:43–45. Using “knowledge of the geometric appearance of a destination,” the tree

structure is processed “to find geometric shapes that typically correspond to the potential destination.” *Id.* at 4:51–56. Similarly, the ’805 patent’s approach can determine distance to a potential destination. *Id.* at 5:34–37. A “trajectory describing an optimized travel path to the potential destination” may be calculated for potential destinations, allowing automated vehicle guidance. *Id.* at 6:21–56. The specification describes that the list of potential destinations is monitored and updated so that new destinations may generate travel paths. *Id.* at 7:1–12.

D. The Challenged Claims

Petitioner challenges claims 1, 2, and 6–11 of the ’805 patent. Pet. 1. Claim 1 is independent and reproduced below.¹

[1.0] 1. A method for assisting guidance of a motor vehicle on the basis of image data, the method comprising:

[1.1] acquir[ing]² image data using an imaging sensor from a surrounding field of the motor vehicle;

[1.2] extracting from the acquired image data positional parameters of at least one potential destination relative to the motor vehicle; and

[1.3] calculating at least one trajectory describing an optimized travel path using the positional parameters so as to assist a subsequent vehicle guidance for at least one of the potential destinations,

[1.4.0] wherein the extracting includes: performing an edge detection and edge segmentation on the image data so as to break down the image data into a plurality of edge segments and storing

¹ For consistency, we use Petitioner’s claim limitation numbers and bracketing format.

² Petitioner notes the clear typographic error in the claim (Pet. 24 n.3), and we agree the claim language should be understood as “acquiring” not “acquired.”

interrelationships of the plurality of edge segments in a mathematical tree structure;

[1.4.1] analyzing the plurality of edge segments for the presence of a geometric object associated with a geometrical form that may at least partially describe a potential destination so as to identify one or more potential geometric objects;

[1.4.2] analyzing the one or more potential geometric objects for plausibility using a matching algorithm so as to identify one or more plausible objects;

[1.4.3] performing an additional acceptance analysis so as to identify at least one accepted object, the additional acceptance analysis including analyzing a shape of the image formation of each object in the image data based on knowledge of at least one imaging property of the imaging sensor relative to the surrounding field; and

[1.4.4] storing at least one accepted object that corresponds to a most proximate destination together with corresponding relative positional data in an object list.

Ex. 1001, 7:57–8:23. Claims 2 and 6–11 depend directly or indirectly from claim 1. *Id.* at 8:24–26, 8:38–67.

E. Asserted Grounds of Unpatentability

Petitioner asserts the following grounds of unpatentability and evidence:

Claim(s) Challenged	35 U.S.C. §	Reference(s)
1, 2, 9, 10	103(a) ³	Broggi ⁴ , Huttenlocher ⁵ , Brady ⁶
6–8, 11	103(a)	Broggi, Huttenlocher, Brady, Bertozzi ⁷

Petitioner also submits the declaration and supplemental declaration of Dr. Jeffrey Rodriguez, (Exs. 1003, 1072), and Patent Owner submits the declarations of Dr. Aditi Majumder, (Exs. 2007, 2010).

F. Supplemental Patent Owner’s Response requesting the Board vacate its Institution Decision.

Before embarking on our patentability analysis, we address the issues raised in the Supplemental Patent Owner’s Response with respect to vacating our Institution Decision and the response in Petitioner’s Reply to Patent Owner’s Supplemental Response. Papers 20, 21.

³ The Leahy-Smith America Invents Act, Pub. L. No. 112-29, 125 Stat. 284 (2011) (“AIA”), amended 35 U.S.C. § 103. The ’889 patent issued from a series of continuation applications, claiming the benefit of U.S. Patent No. 8,009,639, filed Dec. 27, 2006, which is before the effective date of the applicable AIA amendments. Ex. 1001, code (63); Pet. 17. Thus, we refer to the pre-AIA version of 35 U.S.C. § 103. Our decision would be the same were we to apply the AIA version of the statute.

⁴ Broggi, A., Bertozzi, M., Fascioli, A., Guarino Lo Bianco, C., & Piazzzi, A. (2000). Visual Perception of Obstacles and Vehicles for Platooning. *IEEE Transactions on Intelligent Transportation Systems*, 1(3), 164–176. (Ex. 1005).

⁵ Huttenlocher, D. P. (1987). Object Recognition Using Alignment. In *DARPA Image Understanding Workshop* (Vol. I, pp. 370–380). Los Angeles, CA; Morgan Kaufmann Pubs., Inc. (Ex. 1006).

⁶ U.S. Patent No. 5,434,927, issued July 18, 1995 (Ex. 1007).

⁷ Broggi, A., Bertozzi, M., Fascioli, A., & Conte, G. (1999). Automatic Vehicle Guidance: The Experience of the ARGO Autonomous Vehicle. World Scientific Pub. Co. Pte. Ltd. (Ex. 1008).

Patent Owner argues that we should follow the recent decisions in *Revvo Technologies v. Cerebrum Sensor Technologies*, IPR2025-00632, Paper 20 (Nov. 3, 2025) (precedential) and *Tesla v. Intellectual Ventures II*, IPR2025-00340, Paper 18 (Nov. 5, 2025) (informative), and “vacate our Institution Decision in this case.” *Id.* As we explain below, we do not have that authority.

We lack authority to grant the relief Patent Owner requests. *See Berkshire Hathaway Energy Co. v. Birchtech Corp.*, IPR2025-00274, Paper 76 (PTAB Mar. 4, 2026) (denying motion to terminate because the Board lacked authority to decide discretionary issues), *cited with approval in Berkshire Hathaway Energy Co. v. Birchtech Corp.*, IPR2025-00274, Paper 81 at 3 (Squires, Mar. 27, 2026) (noting “the Board correctly determined that it lacked the authority in these IPRs to terminate parallel proceedings challenging the same patents because, under current policy, the Director makes determinations on discretionary issues”); *see also Light & Wonder v. Evolution Malta Ltd.*, IPR2025-01072, Paper 30 at 2 (Squires, June 22, 2026) (explaining, based on Patent Owner’s Motion to Terminate filed after institution, that “[t]he Board subsequently denied the Motion, reasoning correctly that it lacked the authority to terminate these IPRs for discretionary reasons.”).

On March 26, 2025, the Acting Director issued a Memorandum on Interim Processes for PTAB Workload Management (“Interim Process Memo”).⁸ The Acting Director stated:

⁸ Interim Processes for PTAB Workload Management (Mar. 26, 2025), available at: <https://www.uspto.gov/sites/default/files/documents/InterimProcesses-PTABWorkloadMgmt-20250326.pdf>.

[D]ecisions on whether to institute an IPR or PGR will be bifurcated between (i) discretionary considerations and (ii) merits and other non-discretionary statutory considerations. Under this interim procedure, the Director, in consultation with at least three PTAB judges, will determine whether discretionary denial of institution is appropriate. If it is appropriate, the Director will issue a decision denying institution. If it is not appropriate, the Director will issue a decision regarding that determination and refer the petition to a three-member panel of the PTAB assigned according to Standard Operating Procedure (SOP) 1 (Rev. 16). The three-member panel will then handle the case in the normal course.

Interim Process Memo at 1. Although the Interim Process Memo only applies to “proceedings where the deadline . . . to file a preliminary response has not yet passed” (Interim Process Memo at 2), in a subsequent memorandum, the Director restored his authority to exclusively determine discretionary institution issues in all proceedings. Director Institution of AIA Trial Proceedings (Oct. 17, 2025).⁹

The Interim Process Memo and Director Institution Memo, thus, reserves consideration of discretionary issues to the Director. The relief Patent Owner requests is that the panel exercise discretion to terminate these proceedings based on actions taken in related district court proceedings as done in *Hulu*. Supp. PO Resp. 2. Because the basis for Patent Owner’s requested relief is discretionary, the panel lacks the authority to grant the request. In this regard, the present situation is different from that in *Hulu* and *Sinclair Pharma Limited v. Hydrafacial LLC* (IPR2025-00145, Paper 41, Squires, Feb. 12, 2026), cited by Patent Owner. In those cases, the

⁹ Available at:
https://www.uspto.gov/sites/default/files/documents/Director_Institution_of_AIA_Trial_Proceedings.pdf (“Director Institution Memo”).

Director ordered de-institution, not the panel. The Director has not made such a determination or delegated such authority to the panel in these proceedings. Indeed, as noted above, Patent Owner has already briefed, and the Director has previously ruled on, discretionary denial issues. Paper 10.

Accordingly, we decline to vacate our Institution Decision and focus our analysis on the merits of the case as presented by the parties.

III. PATENTABILITY ANALYSIS

Petitioner contends that claims 1, 2, 9, and 10 of the '805 patent are unpatentable under 35 U.S.C. § 103(a) as obvious over Broggi, Huttenlocher, and Brady, and that claims 6–8 and 11 are unpatentable under 35 U.S.C. § 103(a) as obvious over Broggi, Huttenlocher, Brady, and Bertozzi. *See generally* Pet.

A patent claim is unpatentable under 35 U.S.C. § 103(a) if the differences between the claimed subject matter and the prior art are such that the subject matter, as a whole, would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. *KSR Int'l Co. v. Teleflex Inc.*, 550 U.S. 398, 406 (2007). The question of obviousness is resolved on the basis of underlying factual determinations including: (1) the scope and content of the prior art; (2) any differences between the claimed subject matter and the prior art; (3) the level of ordinary skill in the art; and (4) when in evidence, objective evidence of nonobviousness.¹⁰ *Graham v. John Deere Co.*, 383 U.S. 1, 17–18 (1966).

¹⁰ Patent Owner does not present arguments or evidence of secondary considerations. Therefore, secondary considerations do not constitute part of our analysis.

“In an [*inter partes* review], the petitioner has the burden from the onset to show with particularity why the patent it challenges is unpatentable.” *Harmonic Inc. v. Avid Tech., Inc.*, 815 F.3d 1889, 1363 (Fed. Cir. 2016) (citing 35 U.S.C. § 312(a)(3) (requiring *inter partes* review petitions to identify “with particularity . . . the evidence that supports the grounds for the challenge to each claim”)). This burden of persuasion never shifts to Patent Owner. See *Dynamic Drinkware, LLC v. Nat’l Graphics, Inc.*, 800 F.3d 1375, 1378 (Fed. Cir. 2015) (discussing the burden of proof in *inter partes* review).

A. Level of Ordinary Skill in the Art

We consider the asserted grounds of unpatentability in view of the understanding of a person of ordinary skill in the art. In assessing the level of ordinary skill in the art, various factors may be considered, including the “type of problems encountered in the art; prior art solutions to those problems; rapidity with which innovations are made; sophistication of the technology; and educational level of active workers in the field.” *In re GPAC Inc.*, 57 F.3d 1573, 1579 (Fed. Cir. 1995) (quoting *Custom Accessories, Inc. v. Jeffrey-Allan Indus., Inc.*, 807 F.2d 955, 962 (Fed. Cir. 1986)). “[O]ne or more factors may predominate.” *Id.*

Petitioner asserts that ordinarily skilled artisans “would have had a bachelor’s degree in electrical engineering, computer engineering, computer science, or a related subject, and four years of work experience in image processing, automated vehicle control/navigation, or a related field.” Pet. 7. Petitioner’s proposed definition, which Patent Owner does not dispute, appears reasonable and consistent with the asserted prior art and the ’805 patent, and we adopt it here. See generally, PO Resp.

Based on this record, and because there is no dispute, we adopt Petitioner’s articulation of the level of ordinary skill in the art, which is consistent with the ’805 patent and the asserted prior art. *See Okajima v. Bourdeau*, 261 F.3d 1350, 1355 (Fed. Cir. 2001) (the prior art, itself, can reflect appropriate level of ordinary skill in art).

B. Claim Construction

In interpreting the claims of the ’805 patent, we “us[e] the same claim construction standard that would be used to construe the claim[s] in a civil action under 35 U.S.C. [§] 282(b).” *See* 37 C.F.R. § 42.100(b) (2020). The claim construction standard includes construing claims in accordance with the ordinary and customary meaning of such claims as would have been understood by one of ordinary skill in the art and the prosecution history pertaining to the patent. *See id.*; *Phillips v. AWH Corp.*, 415 F.3d 1303, 1312–14 (Fed. Cir. 2005) (*en banc*). It is also important to consider the claims in context of the entire specification as “the specification is always highly relevant to the claim construction analysis. Usually, it is dispositive; it is the single best guide to the meaning of a disputed term.” *Vitronics Corp. v. Conceptronic, Inc.*, 90 F.3d 1576, 1582 (Fed. Cir. 1996).

Petitioner indicates in the Petition that “no claim term requires express construction.” Pet. 7 (citing *Nidec Motor Corp. v. Zhongshan Broad Ocean Motor Co.*, 868 F.3d 1013, 1017 (Fed. Cir. 2017)). In its Response, Patent Owner provides specific claim construction arguments pertaining to various limitations in claim 1. PO Resp. 9–25. Petitioner provides counter arguments and maintains that no express claim constructions are necessary

and that the claims should be given their plain and ordinary meaning. Pet. Reply 2–17.

Because it is dispositive of Petitioner’s challenges, we focus our claim construction on limitation [1.2] and the term “potential destination.” Ex. 1001, 7:61–63.

1. *Whether the ’805 patent limits the claim to guiding a vehicle to a fixed, physical destination*

Patent Owner argues that “the claim language reciting ‘[p]otential destination,’ refers to a physically fixed and contextually relevant location in the vehicle’s surrounding environment—such as a docking station, cargo bay, or parking spot—that is automatically identified from image data based on geometric features and spatial parameters.” PO Resp. 20. Patent Owner’s declarant, Dr. Majumder, testifies that

from the perspective of a person of ordinary skill in the art at the time of the invention, the ‘805 Patent discloses a novel and technically sophisticated system for assisting the guidance of a motor vehicle—particularly trucks—to fixed destinations such as cargo bays, docking stations, or parking platforms.

Ex. 2007 ¶ 29 (citing Ex. 1001, 1:6–8).

For intrinsic support, Patent Owner points to the specification and several descriptions of the “system and method for identifying fixed, physically meaningful destinations—such as docking stations or parking bays—based on the geometric properties of image data.” PO Resp. 18–19 (citing Ex. 1001, 2:15–20 3:23–63, 3:64–4:4). For example, Patent Owner references the ’805 patent’s description “for assisting a motor vehicle guidance on the basis of image data, in particular for maneuvering trucks toward docking stations, including a method and a device suited for implementing this method.” *Id.* at 19 (quoting Ex. 1001, 3:23–27). Patent

Owner argues that docking stations and other non-transient, i.e., fixed locations, such as parking bays, are composed of specific physical features and object parameters from which ““image data are acquired by an imaging sensor from the surrounding field of a vehicle and, from these data, the positional parameters of at least one potential destination relative to the motor vehicle are extracted.”” *Id.* (quoting Ex. 1001, 3:27–31).

Petitioner responds that neither the claims, specification, or Patent Owner’s infringement contentions support this interpretation. Pet. Reply 14. Petitioner argues that in claim 1 “*“potential destination’* is not limited to a stationary object because ‘*image data’* is ‘*acquired...using an imaging sensor from a surrounding field of the motor vehicle,*’ and the ‘*potential destination’* is ‘*extract[ed] from the acquired image data.*” *Id.* at 14–15 (citing Ex. 1001, 7:59–63; Ex.1072 ¶ 42). Petitioner contends that “[w]hile the specification of the ’805 patent provides an example of ‘maneuvering trucks toward docking stations,’ the claims are not limited to this embodiment.” *Id.* at 15 (citing Ex. 1072 ¶ 43; *Liebel-Flarsheim Co. v. Medrad, Inc.*, 358 F.3d 898, 906 (Fed. Cir. 2004)).

Petitioner’s declarant, Dr. Rodriguez, testifies that besides docking station examples, the ’805 patent discloses “other implementations of ‘vehicle guidance,’ such as a ‘lane control system for motor vehicles’ . . . [a]ccordingly, Patent Owner’s attempts to limit the construction of ‘*potential destinations’* to a fixed location are improper.” Ex. 1072 ¶ 44 (citing Ex. 1001, 1:10–2:10).

It is never easy to discern the scope of a claim or whether a patentee has limited the claim language by its lexicography and description in the specification. To understand the metes and bounds of the claim we must

read the claims in conjunction with the written description and drawings. *See Markman v. Westview Instruments, Inc.*, 52 F.3d 967, 979 (Fed. Cir. 1995), *aff'd*, 517 U.S. 370, 116 S. Ct. 1384, 134 L. Ed. 2d 577 (1996) (“Claims must be read in view of the specification, of which they are a part.”); *see also GE Lighting Sols., LLC v. AgiLight, Inc.*, 750 F.3d 1304, 1309 (Fed. Cir. 2014) (The court explaining that “[t]he standards for finding lexicography and disavowal are exacting. To act as its own lexicographer, a patentee must ‘clearly set forth a definition of the disputed claim term,’ and ‘clearly express an intent to define the term.’ *Id.* Similarly, disavowal requires that ‘the specification [or prosecution history] make[] clear that the invention does not include a particular feature.’”) (quoting *SciMed Life Sys. Inc. v. Advanced Cardiovascular Sys., Inc.*, 242 F.3d 1337, 341 (Fed. Cir. 2001)).

Here, in our opinion, Patent Owner has shown that the Specification describes the potential destinations of a vehicle as limited to physically fixed, non-transient objects or features. PO Resp. 18–21. As an initial matter the ’805 patent is titled “Docking Assistant” and explains its purpose for guiding a “vehicle to a stop at a specific location.” Ex. 1001, codes (53), (57), Abstract.

We acknowledge that claim 1 does not expressly recite that “at least one potential destination” is a fixed destination or location. *See id.* at 7:61–63 (Claim 1 requiring “extracting from the acquired image data positional parameters of at least one potential destination relative to the motor vehicle;”). Yet, in the context of the relatively brief specification, there is no explanation, example, or embodiment which reasonably extends the meaning of “destination” or “potential destination” beyond a fixed location.

The '805 patent describes in the Abstract that

[m]any day-to-day driving situations require that an operator of a motor vehicle guide the motor vehicle along a specific course and bring the vehicle to a stop at a specific location, for example in a parking bay or at a loading platform.

Id. at code (57) Abstract. The Abstract explains in the next sentence that “[t]o assist a vehicle operator in such situations, a method and a suitable device for implementing this method, include detecting the potential target objects in the image data of an image sensor *and identifying the potential target objects as potential destinations* in a multi-stage exclusionary method.” *Id.* (emphasis added). Nowhere in this initial description of the invention, nor anywhere else that Petitioner points to, is there is expansion of the “specific location” or “potential destination” beyond a docking station or parking bay. Of course, the claim is not limited to these examples, as it would be inappropriate to read in such limitations from the Specification. *See Acceleration Bay, LLC v. Activision Blizzard Inc.*, 908 F.3d 765, 771 (Fed. Cir. 2018) (“Acceleration again attempts to import structural limitations into claims lacking those limitations. . . . While the specifications discuss a broadcast channel overlaying a network, the claims at issue are not so limited.”).

It is also noteworthy that the Specification does not describe any embodiments using, for example, an image of another vehicle or any other dynamic object that must be iteratively followed, for instance in autonomous roadway driving. *See Gentry Gallery, Inc. v. Berkline Corp.*, 134 F.3d 1473, 1479 (Fed. Cir. 1998) (The court explaining that “a claim need not be limited to a preferred embodiment. However, in a given case, the scope of the right to exclude may be limited by a narrow disclosure.”).

We also find that a plain reading of “in such situations” and “a method and a suitable device for implementing *this method*” immediately following the docking station and parking bay examples compels a less comprehensive meaning than Petitioner urges. Ex. 1001, code (57) Abstract. No other examples in the written description beyond the physically fixed docking station and cargo bay are provided, nor does Petitioner point to any description that reasonably suggests any type of dynamic “potential destination.” Additionally, the only described purpose for the claimed method is to bring a vehicle to a stop at the “potential destination.” As the disclosure of the ’508 patent states, the only stated purpose relevant to the claimed method is a guidance system “for maneuvering trucks toward docking stations, including a method and a device suited for implementing this method.” Ex. 1001, 3:22–25.

Indeed, the ’805 patent is consistent, describing that

[a]n object of the present invention is to provide a method for assisting vehicle guidance on the basis of image data, particularly when maneuvering trucks *toward docking stations*, as well as to provide a device suited for implementing the method, which functions without the need for affixing specific visual signatures at the destination.

Ex. 1001, 2:15–20 (emphasis added). Here, there is no development of the method or device and the docking station example beyond a static feature or location. Moreover, a plain reading of the Specification expressly links the fixed docking station as “the destination.” *Id.* The ’805 patent describes for example that

[t]he present invention provides a method for assisting guidance of a motor vehicle on the basis of image data, particularly when maneuvering trucks *toward docking stations*, in which image

data are acquired by an imaging sensor from the surrounding field of the motor vehicle.

Id. at 2:21–24 (emphasis added). Most every recitation in the ’508 patent of the “present invention” includes the fixed, non-transient “docking station,” and ties it to the destination or as here “the potential destination:”

In the system according to *the present invention* for assisting a motor vehicle guidance on the basis of image data, in particular for maneuvering trucks *toward docking stations*, including a method and a device suited for implementing this method, image data are acquired by an imaging sensor from the surrounding field of a vehicle and, from these data, the positional parameters of at least *one potential destination* relative to the motor vehicle are extracted.

Id. at 3:23–30. In addition to these clear examples, the Specification never extends “the present invention” beyond “potential destination,” such as a physically fixed docking station or parking bay. And these examples, as a whole, expressly tie the docking station to “at least one potential destination.” *Id.*

The only exemplary embodiment of “the present invention” as a whole is described with respect to Figure 2, which we reproduce below “show[ing] exemplarily a typical situation of a truck (20) docking at a cargo door (26, 32) of a warehouse (25, 31).”

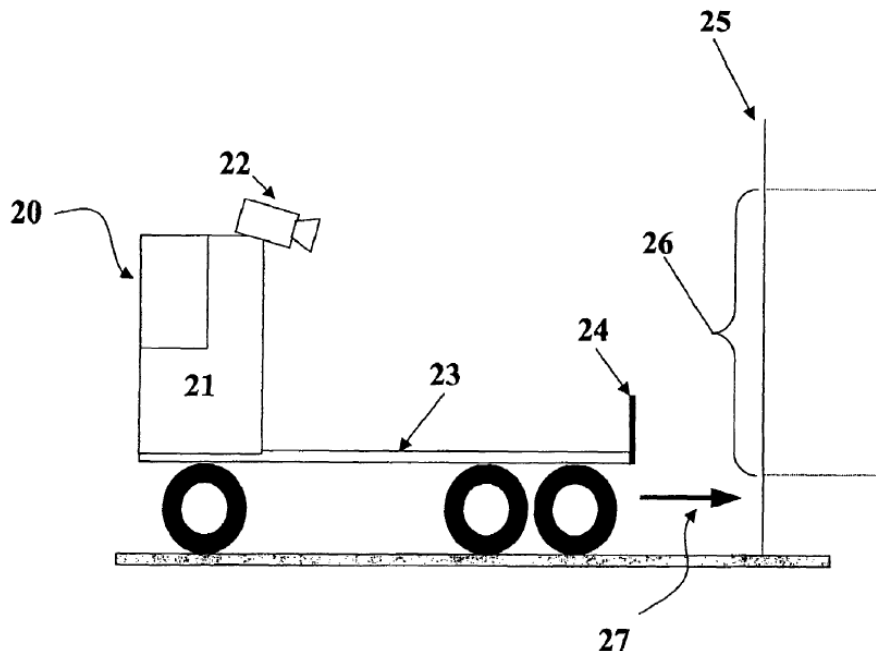


Figure 2

Figure 2 of the '805 patent illustrating truck 20 backing into position relative to docking station 26.

Dr. Majumder testifies persuasively that

[u]nlike conventional approaches that depend on pre-installed infrastructure such as painted lane markings or specialized fiducial symbols at the destination site . . . [t]he invention is fundamentally destination-driven. The term ‘destination,’ as used in the ‘805 Patent, refers to a stationary and contextually meaningful endpoint at which a vehicle may be guided to stop . . . such as a warehouse cargo door or loading platform.”

Ex. 2007 ¶¶ 29–30 (citing Ex. 1001, 1:10–14, 2:32–43). Dr. Majumder’s testimony is consistent with our reading of the ’805 patent. Almost every instance of “the present invention” in the Specification characterizes the “potential destination” as a fixed, stationary feature such as “a parking bay or at a loading platform.” Ex. 1001, code (57) Abstract; *see also id.* at 1:6–9 (“The present invention is directed to a method for assisting vehicle guidance on the basis of image data, particularly when maneuvering trucks

toward docking stations, as well as to a device suited for implementing the method.”).

The Summary of the Invention section of the ’805 patent describes “the object of the invention,” and “the present invention as being a method for “maneuvering trucks toward docking stations.” *Id.* at 2:15–24. The ’805 patent’s characterization of the “present invention” includes several more references to the “docking stations.” *Id.* at 2:55, 3:23–26, *see id.* at 7:23–55 (The ’805 patent characterizing the only exemplary embodiment of the claimed method in Figure 2 as “the present invention.”). Throughout the Specification, the inventor’s characterization of a vehicle moving to and stopping at a specific non-transient “docking station” or “parking bay” as the “present invention” is persuasive evidence that the claimed system method should not be read to encompass dynamic objects such as other moving vehicles. *See SciMed Life Sys., Inc. v. Advanced Cardiovascular Sys., Inc.*, 242 F.3d 1337, 1343 (Fed. Cir. 2001) (The court explaining that “the characterization of the coaxial configuration as part of the ‘present invention’ is strong evidence that the claims should not be read to encompass the opposite structure.”).

Overall, reading claim 1 in light of the Specification, we find that a person of ordinary skill in the art would have understood that the method and system of the present invention is accomplished by an image system identifying a fixed, non-transient feature, such as a docking station or parking bay, as a potential destination. *See Phillips*, 415 F.3d at 1313 (The court explaining that “the person of ordinary skill in the art is deemed to read the claim term not only in the context of the particular claim in which

the disputed term appears, but in the context of the entire patent, including the specification.”).

Considering Petitioner’s first argument, that “‘*potential destination*’ is not limited to a stationary object because ‘*image data*’ is ‘*acquired...using an imaging sensor from a surrounding field of the motor vehicle*,’ and the ‘*potential destination*’ is ‘*extract[ed] from the acquired image data*,” we find this argument unpersuasive. Pet. 14–15. The fact that the “potential destination” is extracted from an image, tells us nothing about what the destination is or isn’t, only that it can be found in an image. This argument is particularly unpersuasive because it reads the claim language so as to encompass *anything* in an image as a potential destination, e.g., a person, the sun, a boat on the water, things that would generally not be understood in any context as a destination.

Petitioner next argues that “the ’805 patent is not limited to stationary objects such as docking stations. Ex. 1072 ¶ 43. For example, the ’805 patent describes ‘camera based position detection and **lane control system[s] for motor vehicles.**” Pet. Reply 15 (citing Ex. 1001, 1:50–54; Ex. 1072 ¶ 43). And, Petitioner argues that Patent Owner has taken a contradictory position in the district court litigation “that the ‘*potential destination*’ in claim 1 covers Tesla’s Autosteer and Auto Lane Change features. *Id.* (citing Ex. 1016, 10).

As for the “lane control system for motor vehicles” that Petitioner points to in the ’805 patent, that is disclosure from a German Patent Application DE 10323915.4 discussed in the background. Ex. 1001, 1:50–54. According to the relevant background description in the ’805 patent, this German application discusses “superposing the visual signature in the field

surrounding the vehicle on a template of a visual signature stored in a memory.” *Id.* at 1:58–60. First, this is a description of the German application, not the ’805 patent or “the present invention.” Second, The German application appears to describe superposing a specific visual signature on a stored visual signature to improve reliability. *See id.* at 1:64–67 (the background of the ’805 patent explaining that “[b]y using template matching for the problem at hand, one very advantageously utilizes the fact that this method is highly reliable, even when the visual signature in the image data is not fully visible due to obscuration.”). Third, to the extent the German application is a “lane control system,” as Petitioner asserts, the “visual signatures” described are also not dynamic, but described as “boundary lines.” *Id.* at 1:42–44.

Notably, the only place that the noun “lane” is recited in the ’805 patent Specification is where it is explained that “the trajectory which is computed for that purpose and which describes an optimized travel path. This information may be provided by showing the ideal trajectory on a display; ideally, in this connection, the trajectory *of the planned lane being superposed symbolically on camera image data representing the driver's field of view.*” *Id.* at 6:48–51 (emphasis added). This description in the ’508 patent has nothing to do with following another vehicle, changing lanes or lanes painted on a roadway, but with a visual aid, where “the planned lane” is superimposed on a camera display for a vehicle driver to aid in steering the vehicle. *Id.* at 6:40–51.

Although dependent claim 12 is not at issue in this proceeding, we note that claim 12 depends directly from claim 1 and further includes that “the motor vehicle is a truck and wherein the surrounding field includes a

docking station.” *Id.* at 9:1–3. Our construction does not limit claim 1 to “a docking station” and it is reasonable to understand that there are many physically fixed locations or destinations besides “a docking station” for a vehicle that would be reasonably encompassed by the claims as properly interpreted, for example a parking bay, a residential garage, or a fuel pump. The fact that claim 12 further recites “a docking station” does not alter our interpretation of claim 1.

Indeed, even the plain and ordinary meaning of the word “destination” does not elicit how Petitioner would have us understand it—that is—essentially an infinite number of waypoints of a platooning vehicle. *See* Pet. 27 (Petitioner arguing that “[t]he location of the preceding vehicle represents a potential destination of the motor vehicle.”). The Miriam Webster Online Dictionary defines “destination” as “a place to which one is journeying or to which something is sent.” Ex. 3001.¹¹ If we decide to travel to a vacation destination on Cape Cod, and a friend asks where we are vacationing, we would not respond with Boston, even though we might pass through Boston on the way to Cape Cod. If we stop in Boston to enjoy a Red Sox game at historic Fenway Park, that too might be a destination. It is unlikely that a reasonable person, or a person of ordinary skill in the art, would assume that my “destination” includes an infinite number of waypoints defined by a preceding moving vehicle between the start of the journey and either Fenway Park or Cape Cod.

Finally, with respect to Patent Owner’s interpretation before the district court, we understand the conflicting nature of the arguments as

¹¹ MIRIAM WEBSTER ONLINE DICTIONARY, <https://www.merriam-webster.com/dictionary/destination>, last visited July 6, 2026.

Petitioner explains it, however that is an issue which the parties will develop further in the district court litigation considering our interpretation in this Decision.

Having considered all the evidence before us, including the express disclosure of the '805 patent and the language of the claims, we determine that the claimed “potential destination” would not be a transient object such as another vehicle, but includes a physically fixed location where an operator may guide a vehicle to a stop. Ex. 1001, code (57), Abstract, 1:10–14; PO Resp. 20; *see Gentry Gallery*, at 1480 (The court explaining “that claims may be no broader than the supporting disclosure, and therefore that a narrow disclosure will limit claim breadth.”).

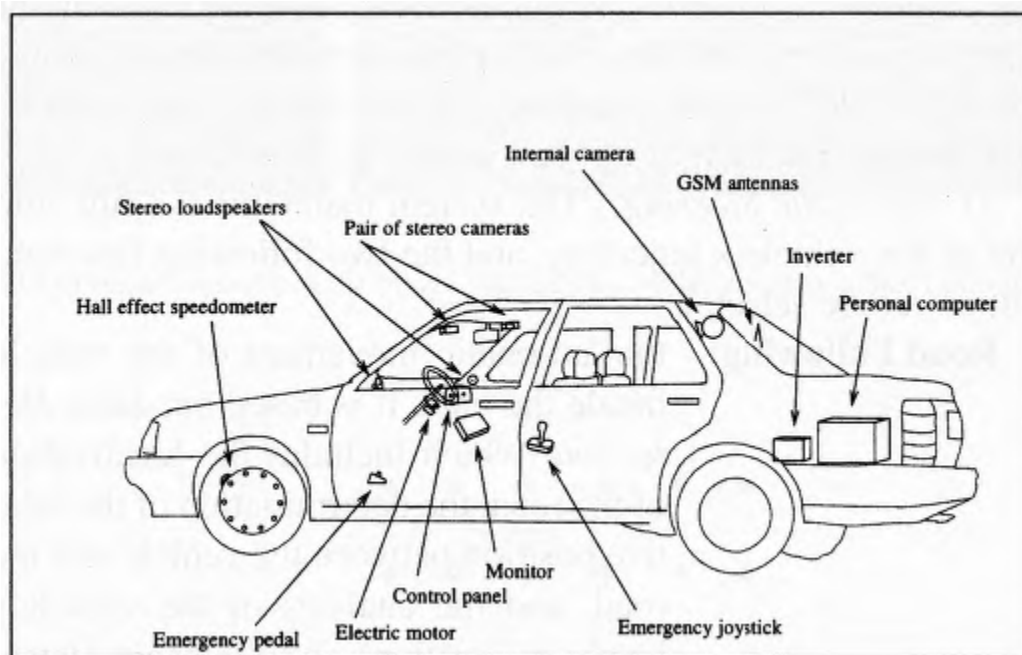
C. The Prior Art

Before turning to Petitioner’s grounds of unpatentability, we provide a summary of the asserted primary reference to Broggi.

1. *Broggi (Ex. 1005)*

Broggi is titled “Visual Perception of Obstacles and Vehicles for Platooning” and describes that “an autonomous vehicle must be able to detect vehicles and potential obstacles on its path in order to perform *Road Following*.” Ex. 1005, 164.¹² Broggi describes a relevant motor vehicle including cameras, speakers, and a monitor, in Figure 1, reproduced below.

¹² For Broggi (Exhibit 1005) we refer to the actual page numbers of the reference itself.

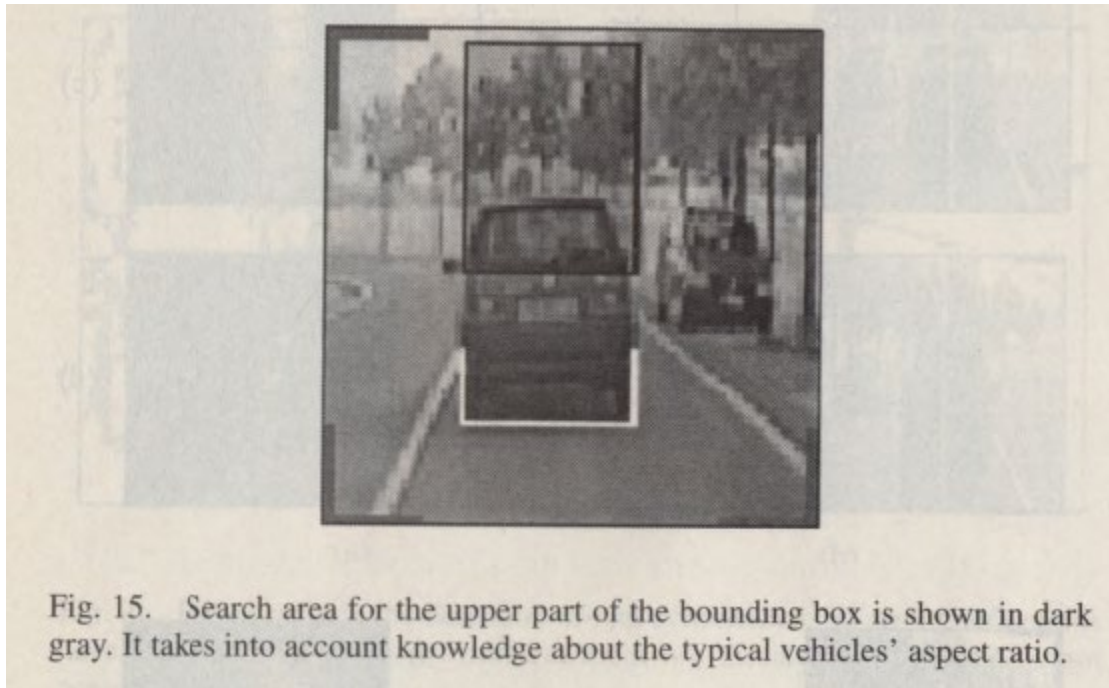


Broggi's motor vehicle obtains images from the cameras and explains that it is able to determine its position with respect to the lane, to compute road geometry, to detect generic obstacles on the path, and to localize a leading vehicle. The images acquired by a stereo rig placed behind the windshield are analyzed in real-time by the computing system located in the boot. The results of the processing are used to drive an actuator mounted onto the steering wheel and other driving assistance devices.

Id. at 165.

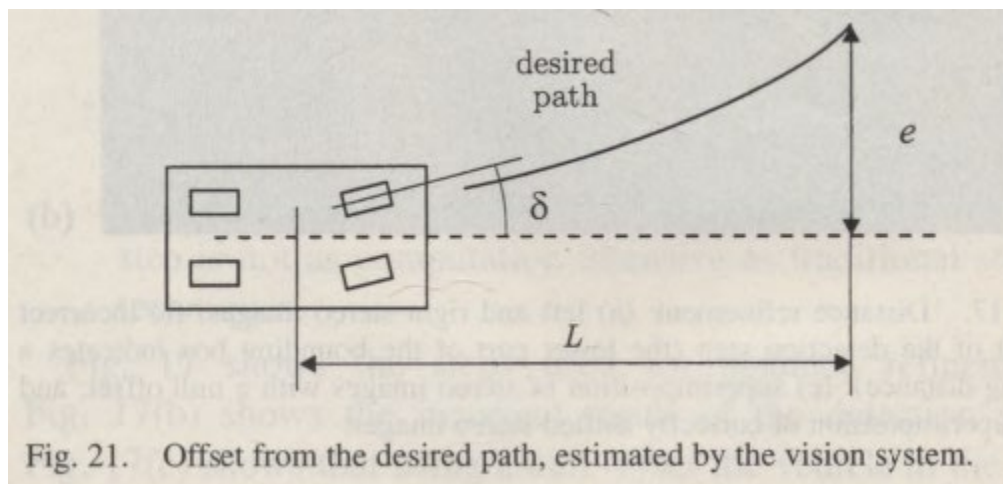
For detecting a preceding vehicle during what is called “platooning,” Broggi analyzes a specific region of the image to detect the preceding vehicle in “an area of interest is identified on the basis of road position and perspective constraints.” Ex.1005, 170. A “traditional pattern matching technique” is used to detect a bounding box of the preceding vehicles by (1) determining “two corners representing the bottom of the bounding box around the vehicle,” and (2) detecting “the top part of the bounding box, which is looked for in a specific region whose location is again determined

by perspective and size constraints.” Ex.1005, 170-171. Figure 15 reproduced below depicts a search area for an upper part of the bounding box:



Broggi's Figure 15 shows a lower part of the bounding box, white partial rectangle, and a search area in grey for an upper part of the bounding box.

After distance refinement, a desired path for the following vehicle is then calculated based on the determined location of the preceding vehicle as shown in Figure 21, reproduced below.



Broggi's Figure 21 illustrates the steering angle δ determined based on the reconstruction of the road environment and "the offset e existing between the vehicle heading and the desired path [that] is computed at the look-ahead distance L ." *Id.* at 173.

D. Ground 1: Claims 1, 2, 9, and 10 – Obviousness over Broggi, Huttenlocher, and Brady

Petitioner contends that claims 1, 2, 9, and 10 of the '805 patent are unpatentable under 35 U.S.C. § 103(a) as obvious over Broggi, Huttenlocher, and Brady. Pet. 9–61. Patent Owner opposes. PO Resp. 9–57. Having considered the complete record now before us, we determine that Petitioner has not shown by a preponderance of the evidence that claims 1–2, 9, and 10 would have been obvious over Broggi, Huttenlocher, and Brady.

1. Independent claim 1

a) Whether Broggi discloses "at least one potential destination" as recited in claim 1

Patent Owner argues that claim 1, specifically limitation [1.3], "demands trajectory computation using the stored positional data of an accepted destination object, but Broggi never generates or uses such data."

PO Resp. 44. Patent Owner contends specifically that

Broggi's moment-to-moment steering toward a moving car is not "calculating at least one trajectory describing an optimized travel path using the positional parameters" of an accepted destination object as [1.3] requires; it is a different class of behavior that the intrinsic record distinguishes from the claimed destination-based planning.

Id. at 44. Thus, according to Patent Owner "Broggi fails to satisfy the requirement that the system calculate 'at least one trajectory describing an optimized travel path . . . to assist a subsequent vehicle guidance for at least

one of the potential destinations,’ as recited in the challenged claims.” *Id.*
We agree that Broggi does not teach or disclose this limitation in claim 1.

In our claim construction, *supra*, we determined that a “potential destination” includes a “physically fixed location.” Section II.B.1. Broggi does not determine a “potential destination” as recited in claim 1 and properly construed, but is following, or “platooning,” with another preceding vehicle that is not physically fixed. *See* Ex. 1005, 170 (Broggi stating that “[t]he next section presents the solution currently implemented on ARGO: a different algorithm which is limited to Vehicle Detection. It can be efficiently employed for Platooning due to its good sensitivity in the area far in front of the vehicle.”).

Broggi describes for example that

[t]he platooning functionality depends on a robust detection of the distance and speed of the preceding vehicle. Since Obstacle Detection does not generate sufficiently reliable results—in particular regarding obstacle *distance*,—a new functionality (Vehicle Detection) has been considered; the vehicle is localized and tracked using a single monocular image sequence; the correct distance is refined thanks to stereo vision.

Id. Petitioner’s declarant Dr. Rodriguez testifies that “[d]uring platooning, the system of Broggi localizes and tracks the preceding vehicle so that the following vehicle can navigate to the location of the preceding vehicle.”

Ex. 1003 ¶ 37. Dr. Rodriguez testifies further that “a preceding vehicle is a *potential destination* because platooning, as described in Broggi, is the automatic following of a preceding vehicle.” *Id.* ¶ 88.

Patent Owner’s declarant, Dr. Majumder, testifies to the contrary that “[r]ead as an engineer, the ‘805 patent’s present invention is framed around guiding a vehicle to fixed, physical destinations (exemplified by docking

stations and similar structures) without fiducials or special markings.” Ex. 2010 ¶ 81. Considering Broggi, Dr. Majumder testifies further that “[a] moving object, such as a preceding car, is not a valid destination under the ‘805 Patent, because it is not a stationary location at which the host vehicle can be guided to stop. To treat such a vehicle as a ‘potential destination’ would lead to collision, not guidance.” *Id.* ¶ 86.

As discussed in our claim construction, given a plain reading of claim 1 in light of the Specification, our understanding of the ‘805 patent is consistent with Dr. Majumder’s testimony. We agree that Broggi is directed expressly to the platooning of moving vehicles, and not physically fixed destinations as the proper claim construction requires. Because Broggi does not disclose the use of physically fixed “potential destinations” as required, e.g., in limitations [1.2]–[1.3], and neither Huttenlocher nor Brady are relied upon to overcome this deficiency, Petitioner has not met its burden of persuasion to show by a preponderance of the evidence that claim 1 would have been obvious over Broggi in view of Huttenlocher and Brady.

In addition, we show below how Petitioner’s mapping is further deficient with respect to claim 1, and specifically limitation [1.3].

b) Whether Broggi discloses “calculating at least one trajectory describing an optimized travel path using the positional parameters” as required in limitation [1.3]

By way of introduction to the following analysis, we point out that Broggi arguably discloses that the following vehicle is provided a desired steering angle δ in order to platoon with the preceding vehicle. *See* Ex. 1005, 173 (Broggi explaining that that “[r]oughly speaking this problem is centered on finding a satisfactory law for the command of the steering wheel.”). It is important to understand that it is steering angle δ which

Petitioner equates to the claimed “at least one trajectory” in limitation [1.3]. *See* Pet. 32 (Petitioner arguing that “[t]he steering angle is a *trajectory* describing the desired path because the steering angle defines the direction the vehicle will follow along the desired path from the current position.”). Yet limitation [1.3] requires more than “calculating at least one trajectory,” it also requires “an optimized travel path using the positional parameters.” Ex. 1001, 7:64–65. As discussed below, we find that Petitioner’s reliance on Broggi’s steering angle does not show sufficiently how Broggi, alone or in combination with Huttenlocher and Brady, discloses limitation [1.3].

Petitioner argues that “Broggi discloses *calculating at least one trajectory describing an optimized travel path* by calculating a steering angle δ for a desired path as shown in Figure 21.” Pet. 32 (citing Ex. 1003 ¶ 91). We can agree that Broggi teaches determining a “steering angle δ ” that can result in a trajectory that is an “optimized travel path,” but Petitioner’s argument does not account for how the claim expressly recites that the trajectory is optimized by “using the positional parameters.”

It is clear from a plain reading of claim 1 and the “extracting” step of limitation [1.2], as well as the additional “extracting” limitations [1.4.0]–[1.4.4], that before an optimized travel path is determined in limitation [1.3], an “accepted object” defining a physically fixed destination must be stored along with “relative positional data” as recited in limitation [1.4.4]. Ex. 1001, 7:61–8:23. Our understanding of the claim is supported by the only example in the Specification. The ’850 patent describes that after “objects 32, 33, 34a and 34b are identified as geometric objects typically corresponding to a potential destination” some of the objects, i.e., 34a, 34b, are eliminated by a matching algorithm “since they do not have a trapezoidal

shape.” *Id.* at 7:27–29, 39–43. The Specification explains that any remaining objects are checked for a normal or typical relative position with respect to the vehicle, and any abnormal object, i.e., object 33, is also eliminated, where “solely object 32 remains as a potential destination in this example, so that its parameters may be stored in destination memory (18) and be retrieved for computing the trajectory describing an optimized travel path.” *Id.* at 7:43–55.

Where Petitioner’s mapping argument comes up particularly short is the conclusory assertion that Broggi teaches reaching a destination by “an optimized travel path using *the positional parameters* so as to assist a subsequent vehicle guidance for at least one of the potential destinations” as required in limitation [1.3]. Pet. 32–37. As discussed above, based on a plain reading of the claim, limitation [1.3] must use the “positional parameters” of limitation [1.2], which are determined and stored in “extracting” steps [1.4.0]–[1.4.4] along with the accepted object. Ex. 1001, 7:61–8:23. Petitioner’s reasoning that Broggi’s desired path “is optimized for ‘**automatically follow[ing]** the vehicle ahead’ as part of the described platooning functionality” is simply a desired result and disregards the claim limitations requiring the optimization to occur based on the stored “accepted object” and its “relative positional data.” Pet. 34.

Similarly, we do not find Petitioner’s argument persuasive that “Broggi’s desired path is also optimized because it provides a path reachable in view of the *vehicle’s capabilities*.” *Id.* at 35 (emphasis added). We disagree with Petitioner’s assertion that a general characteristic of “vehicle capabilities,” “is consistent with the ’805 patent rejecting destinations that are unreachable based on the capability of the vehicle when calculating the

trajectory describing an optimized path.” *Id.* (citing Ex. 1001, 6:35–39).

This argument is unpersuasive because no limitation as to “vehicle capabilities” is recited in claim 1. Petitioner’s argument appears to implicate a portion of the ’805 patent Specification that describes a different reason for rejecting an object as a destination, where “destinations are also rejected which are not able to be reached in consideration of the given steering properties and capabilities of the motor vehicle.” Ex. 1001, 6:38–40. Such a “vehicle capabilities” limitation or embodiment is simply not found in the claim 1.

Petitioner argues further that Broggi “extracts *positional parameters* by extracting a relative location and associated distance of the preceding vehicle from the acquired image data as part of platooning.” PO Resp. 35 (citing Ex. 1005, 170–172). Petitioner contends that “[t]he steering angle is *calculat[ed]*” through the relative position and distance of the preceding vehicle. *Id.* (citing Ex. 1005, Figs. 19–20, Table I; Ex. 1003 ¶¶ 96–97. Petitioner provides an annotated version of Broggi’s Figure 20, reproduced below.

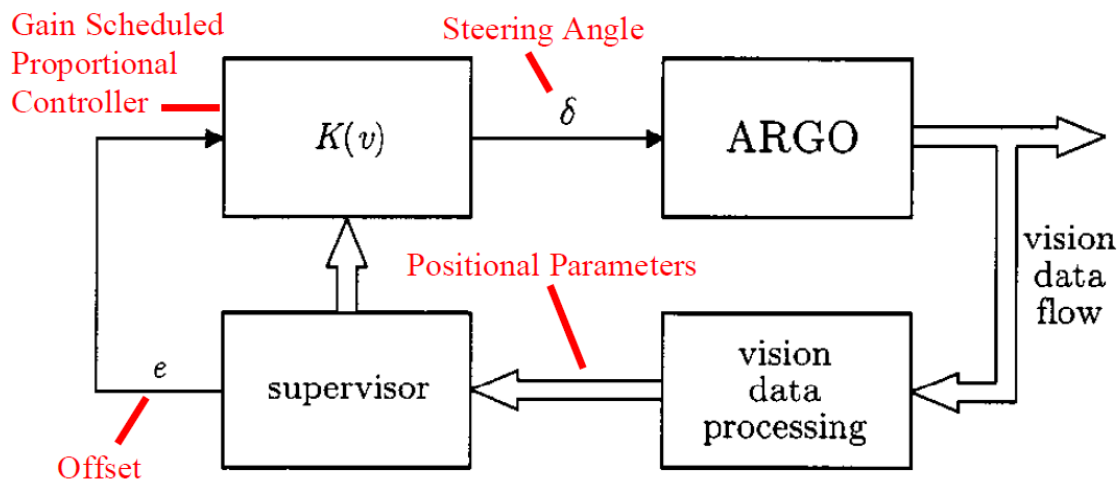


Fig. 20. Control scheme with the gain scheduled proportional controller.

Broggi's Figure 20 as annotated by Petitioner illustrates vision data flow from ARGO through vision data processing block which produces positional parameters that are used by supervisor block and gain scheduled proportional controller $K(v)$ to determine the appropriate steering angle δ for the vehicle. Ex. 1005, 173.

We acknowledge Broggi's disclosure that the steering angle "is evaluated using the estimated position of the preceding vehicle." Ex. 1005, 165. However, this argument fails because it ignores extracting limitations [1.4.0]–[1.4.4]. Besides the fact that Broggi is estimating relative position using a moving, preceding vehicle, and not a physically fixed location, Petitioner fails to explain sufficiently how Broggi's "estimated position" meets the stored accepted destination and positional data as determined in limitations [1.4.0]–[1.4.4]. In other words, Broggi's "estimated position" i.e., the claimed "positional parameters" determined in vision data processing block in Figure 20, is described by Petitioner only as "the relative location and/or distance of the preceding vehicle [] utilized by the supervisor and gain scheduled proportional controller to select and output the appropriate steering angle for the desired path to the motor vehicle." Pet. 36 (citing Ex. 1005, Fig. 20). Petitioner never truly comes to grips with *how* this "estimated position" is obtained or determined in vision data processing block of Figure 20, much less obtained using the stored positional data of an accepted destination object as required by limitation [1.4.4]. Overall, we agree with Patent Owner that simply adjusting the steering of a following vehicle based on an estimated location of a preceding vehicle from an image as taught by Broggi does not meet the requirements of limitation [1.3], which requires that the vehicle guidance be determined based on the stored

“positional parameters” of an accepted destination object as determined via limitations [1.4.0]–[1.4.4].

Neither Huttenlocher nor Brady cures these deficiencies. Petitioner uses Huttenlocher to address mathematical tree structure and pattern matching recitations in limitations [1.4.0]–[1.4.2]. But even if Huttenlocher meets these limitations, for example by “analyzing the plurality of edge segments for the presence of a geometric object,” as recited in limitation [1.4.1], it does not fill the void left by Petitioner with respect to limitation [1.3]—that is—Huttenlocher does not explain why a person of ordinary skill in the art would have understood the claimed optimized travel path would be derived from a stored accepted object and its relative positional data that are determined using edge segmentation.

As for limitation [1.4.4] Petitioner turns to Brady in combination with Broggi, for teaching an object list of stored vehicles with corresponding positional data. Pet. 54. Petitioner argues that “[i]n the combination, vehicles detected by Broggi, including at least the identified preceding vehicle (a name or an identifier associated with the identified preceding vehicle), are *stored...in an object list*, such as a vehicle log, per Brady.” *Id.* at 55 (citing Ex. 1007, 11:21–25). Petitioner argues that Brady also discloses storing positional information for the vehicles because the vehicle log includes track histories associated with the stored vehicles. *Id.* (citing Ex. 1007, 11:21–25).

To the extent Brady discloses storing an accepted vehicle and its track history, as in Broggi, Brady is relied on for identifying and storing information relating to moving vehicles, not physically fixed objects that are “destinations” as claimed. *See* Ex. 1007, 1:6–8 (Brady describing that

“[t]his invention relates generally to systems used for traffic detection, monitoring, management, and vehicle classification and tracking.”).

Petitioner concludes that “Broggi in view of Huttenlocher and Brady renders obvious *storing at least one accepted object that corresponds to a most proximate destination together with corresponding relative positional data.*”

Pet. 56. Even if Petitioner’s interpretation of Brady is correct as to limitation [1.4.4], this does not rectify the problem with respect to limitation [1.3] and Petitioner’s inadequate application of Broggi’s steering angle as an “optimized travel path” where limitation [1.3] requires using the stored accepted object and positional data to calculate an optimal path. Ex. 1001, 7:64–67.

c) Conclusion

In summary, we find that Petitioner’s analysis fails on at least two fronts. First, we find that Broggi’s platooning features relative to a preceding moving vehicle are fundamentally different from the claimed invention of guiding a vehicle to a physically fixed destination. As discussed above, Broggi, as well as Huttenlocher and Brady specifically relate to platooning and the identification and following of moving vehicles. *See, e.g.*, Ex. 1007 (Brady describing “systems used for traffic detection, monitoring, management, and vehicle classification and tracking.”).

Second, the Petition fails to adequately explain why, and how, a person of ordinary skill in the art, considering the prior art of record to Broggi, Huttenlocher, and Brady, would have calculated an optimized trajectory as called for in limitation [1.3] based on stored accepted object and relative positional data. Brady may arguably disclose storing an object and its relative positional data, but the Petition does not use, or persuasively

explain how such teaching would have been used in limitations in [1.3] for calculating the claimed “optimized travel path” considering Petitioner’s mapping of Broggi’s steering angle derived trajectory to limitation [1.3].

Accordingly, Petitioner has failed to show by a preponderance of evidence that claim 1 and dependent claims 2, 9, and 10 would have been obviousness over Broggi, Huttenlocher, and Brady

E. Ground 2: Dependent claims 6–8 and 11 – Obviousness over Broggi, Huttenlocher, Brady, and Bertozzi

Petitioner relies on Bertozzi for certain additional limitations in these challenged dependent claims, for example relating to position and operational characteristics of a steering wheel in dependent claim 6. Pet. 64–81. Because each of these claims depends either directly or indirectly from claim 1 and Bertozzi does not cure the deficiencies discussed above with respect to the primary reference Broggi, we also find that Petitioner has failed to show by a preponderance of evidence that claims 6–8 and 11 would have been obviousness over Broggi, Huttenlocher, Brady, and Bertozzi.

IV. CONCLUSION

Petitioner has not proved by a preponderance of the evidence that claims 1, 2, 9, and 10 would have been obvious over Broggi, Huttenlocher, and Brady.

Petitioner has not proved by a preponderance of the evidence that claims 6–8 and 11 would have been obvious in view of Broggi, Huttenlocher, Brady and Bertozzi.

Our conclusion is summarized in the following table.

Claim(s)	35 U.S.C. §	Reference(s) /Basis	Claim(s) Shown Unpatentable	Claim(s) Not Shown Unpatentable
1, 2, 9, 10	103(a)	Broggi, Huttenlocher, Brady		1, 2, 9, 10
6–8, 11	103(a)	Broggi, Huttenlocher, Brady, Bertozzi		6–8, 11
Overall Outcome				1, 2, 6–11

V. ORDER

For the reasons given, it is

ORDERED, based on a preponderance of the evidence, that claims 1, 2, and 6–11 are not unpatentable; and

FURTHER ORDERED, because this is a final written decision, the parties to this proceeding seeking judicial review of our Decision must comply with the notice and service requirements of 37 C.F.R. § 90.2

IPR2025-00342
Patent 7,336,805 B2

FOR PETITIONER:

Jonathan Bowser
Scott Jarratt
Greg Webb
Matthew Beck
Michael McCarty
HAYNES AND BOONE, LLP
jon.bowser.ipr@haynesboone.com
scott.jarratt.ipr@haynesboone.com
greg.webb.ipr@haynesboone.com
matthew.beck.ipr@haynesboone.com
michael.mccarty.ipr@haynesboone.com

Ashraf Fawzy
TESLA, INC.
afawzy@tesla.com

PATENT OWNER:

Brandon Theiss
Daniel Golub
Ryan O'Donnell
Robert Leonard
VOLPE KOENIG
btheiss@vklaw.com
dgolub@vklaw.com
rodonnell@vklaw.com
rleonard@vklaw.com,

Russell Rigby
INTELLECTUAL VENTURES II LLC
rrigby@intven.com