

Filed: October 28, 2014

Filed on behalf of:

Patent Owner Gentherm GmbH
By: Stephen C. Jensen
Jared C. Bunker
KNOBBE, MARTENS, OLSON & BEAR, LLP
2040 Main Street, 14th Floor
Irvine, CA 92614
Tel.: (949) 760-0404 Fax: (949) 760-9502
Email: BoxGentherm@knobbe.com

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

IGB AUTOMOTIVE LTD. and
I.G. BAUERHIN GmbH

Petitioners,

v.

GENTHERM GmbH

Patent Owner.

Case IPR2014-00666
U.S. Patent 7,229,129

PATENT OWNER'S PROPOSED MOTIONS

Pursuant to the Decision Instituting *Inter Partes* Review (Paper 7) and the Office Patent Trial Practice Guide, 77 Fed. Reg. 48756, 48765–66 (Aug. 14, 2012), Patent Owner Gentherm GmbH hereby provides a list of proposed motions it may file, or seek authorization to file, in this proceeding:

- motion to amend;
- motion(s) for additional discovery relating to objective indicia of nonobviousness or factual issues that may be raised by Petitioner; and
- motion for observation on cross-examination.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: October 28, 2014

By /Jared C. Bunker/

Stephen C. Jensen, Reg. No. 35,556

Jared C. Bunker, Reg. No. 58,474

Eric M. Dobrusin, Reg. No. 33,867

Daniel Aleksynas, Reg. No. 62,551

Email: BoxGentherm@knobbe.com

Attorneys for Patent Owner

Gentherm GmbH

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **PATENT OWNER'S PROPOSED MOTIONS** is being served on October 28, 2014, via email pursuant to 37 C.F.R. § 42.6(e) per agreement of the parties, to counsel for IGB Automotive Ltd. and I.G. BAUERHIN GmbH, at the addresses below:

Christopher Fildes
Jeremy Gajewski
fildespat@teleweb.net
Fildes & Outland, P.C.
20916 Mack Avenue, Suite 2
Gross Pointe Woods, Mich. 48236
(313) 885-1500

Dated: October 28, 2014

/Jared C. Bunker/

Stephen C. Jensen, Reg. No. 35,556
Jared C. Bunker, Reg. No. 58,474

Eric M. Dobrusin, Reg. No. 33,867
Daniel Aleksynas, Reg. No. 62,551

Attorney for Patent Owner
Gentherm GmbH