

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY  
Petitioner

v.

VERSATA DEVELOPMENT GROUP, INC.  
Patent Owner

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Case IPR2016-01014  
Patent No. 5,825,651

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**PATENT OWNER'S MOTION FOR DISTRICT COURT (*PHILLIPS*)  
CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.100(b)**

***Mail Stop "PATENT BOARD"***  
Patent Trial and Appeal Board  
U.S. Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

**I. Authorization and Relief Requested**

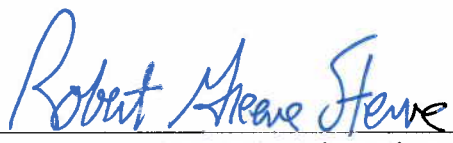
Patent Owner Versata Development Group, Inc. requests a district court-type claim construction approach under the standard provided by *Phillips v. AWH Corp.*, 415 F.3d 1303 (Fed. Cir. 2005), in accordance with 37 C.F.R. § 42.100(b) (effective May 2, 2016).

**II. Certification**

Versata certifies that subject U.S. Patent No. 5,825,651 (“the ’651 Patent”) will expire within 18 months from the entry of the Notice of Filing Date Accorded to Petition. The Notice of Filing Date Accorded to Petition was entered on May 12, 2016. The ’651 patent will expire prior to November 12, 2017.

Respectfully submitted,

Date: June 8, 2016

By:   
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*Lead Attorney for Patent Owner  
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**CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))**

The undersigned hereby certifies that a true and correct copy of the enclosed  
**PATENT OWNER'S MOTION FOR DISTRICT COURT (PHILLIPS)**  
**CLAIM CONSTRUCTION UNDER 37 C.F.R. § 42.100(b)** was served  
electronically via e-mail on June 8, 2016, in its entirety on the following counsel of  
record for Petitioner:

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