# EXHIBIT 17

## U.S. Patent No. 7,154,200

Claims 1, 2, 4, 6, and 7 Toyota / Aisin Water Pump Toyota P/N 161A0-29015 Aisin P/N WPT-190

1. A motor comprising:

The Toyota / Aisin Water Pump (the "Aisin Pump") has a Toyota part number 161A0-29015 and Aisin part number WPT-190:



O.E. Part #	Manufacturer	AISIN Part #
16120-49046	Toyota	WPT-065
16120-49055	Toyota	WPT-065
16120-49065	Toyota	WPT-084
16120-49080	Toyota	WPT-084
161A0-29015	Toyota	WPT-190
161A0-39015	Toyota	WPT-190
161A0-39025	Toyota	WPT-191

Aisin Cooling Catalog 2016.pdf at 145 (hereinafter "Aisin Cooling Catalog"), *available at* 

http://aisinaftermarket.com/FlipBook/CoolingCatalog/mobile/index.html (downloaded Dec. 6, 2016)

IMG\_1696.JPG

The Aisin Pump is marked with both the Toyota and Aisin logos:



IMG\_1695.JPG

The Aisin Pump is a water pump and is believed to be installed in the following 2016 Toyota models:

- Toyota Prius C Persona Series 1.5L L4 Electric/Gas
- Toyota Prius C Four 1.5L L4 Electric/Gas
- Toyota Prius C Two 1.5L L4 Electric/Gas
- Toyota Prius C Three 1.5L L4 Electric/Gas
- Toyota Prius C One 1.5L L4 Electric/Gas

- Toyota Prius V Five 1.8L L4 Electric/Gas
- Toyota Prius V Two 1.8L L4 Electric/Gas
- Toyota Prius V Four 1.8L L4 Electric/Gas
- Toyota Prius V Three 1.8L L4 Electric/Gas



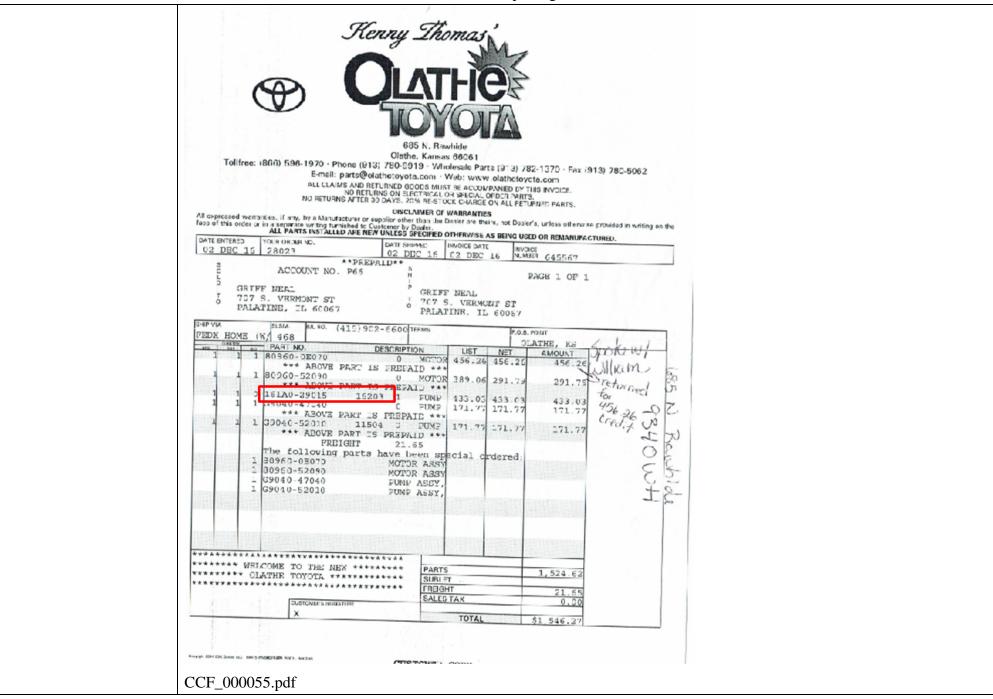
http://parts.olathetoyota.com/oe-toyota/161a039025 (accessed December 12, 2016).

The Aisin Pump is made in Japan:

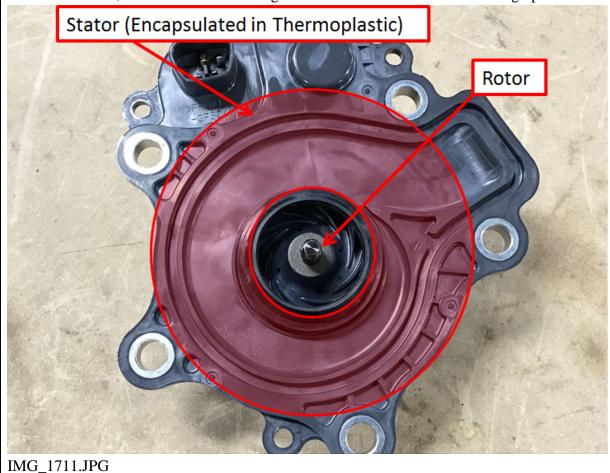


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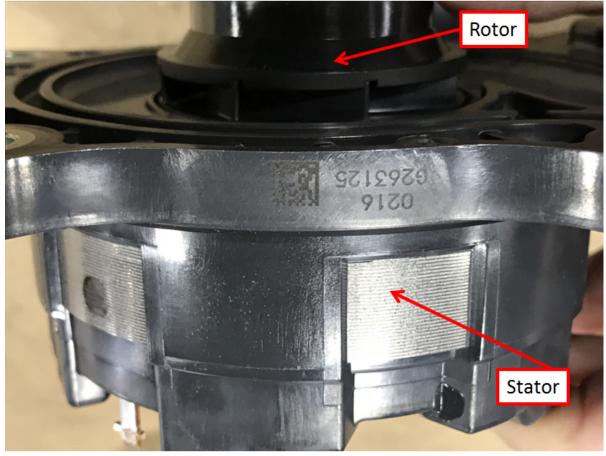
The Aisin Pump is an electric pump assembly, as indicated on the packaging label directly above and as listed below on the purchase receipt.



As shown in greater below with respect to the other limitations of claim 1, the Aisin Pump is an electric motor having a stator and a rotor, where the stator is designed to cause the rotor to rotate during operation.



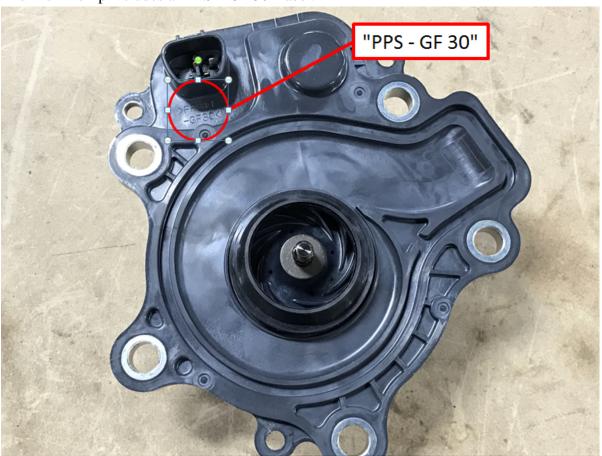
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 $IMG_1742.JPG$ 

a) a stator substantially encapsulated within a body of thermoplastic material; and The Aisin Pump comprises a stator substantially encapsulated within a body of thermoplastic material.

The Aisin Pump includes a "PPS – GF 30" label:

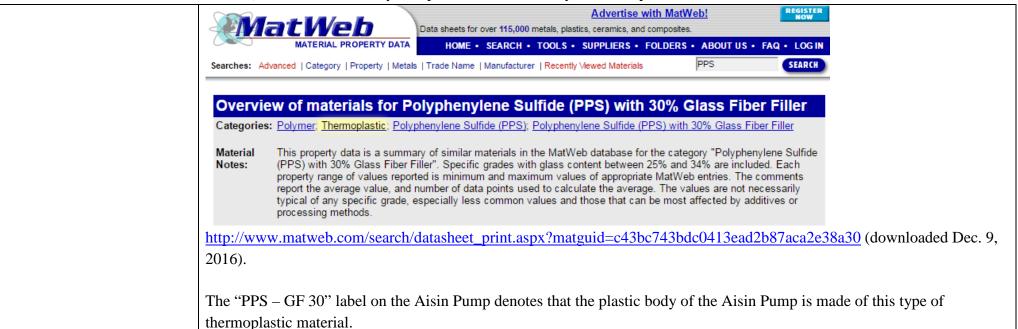


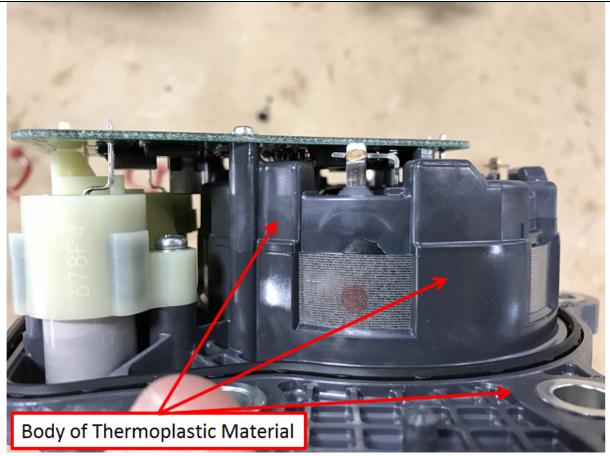
IMG\_1711.JPG

"PPS – GF 30" refers to polyphenylene sulfide with 30% glass fiber filler ("PPS-GF30"). *See, e.g.*, U.S. Patent Publication 2009/0173903 (application No. 12/295,565), at ¶ 0114 ("The abbreviations of the resin names in the tables above are as follows. PPS-GF30: Polyphenylene sulfide resin containing 30 wt % of glass fibers"). PPS-GF30 is a thermoplastic – the excerpt pictured below is a summary of its properties (including the categories of which it is a member, which includes "thermoplastic") from the MatWeb database of material property data.

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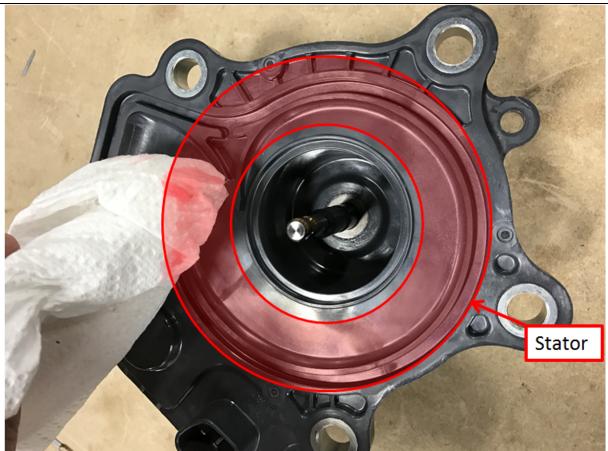
"a) a stator substantially encapsulated within a body of thermoplastic material; and"





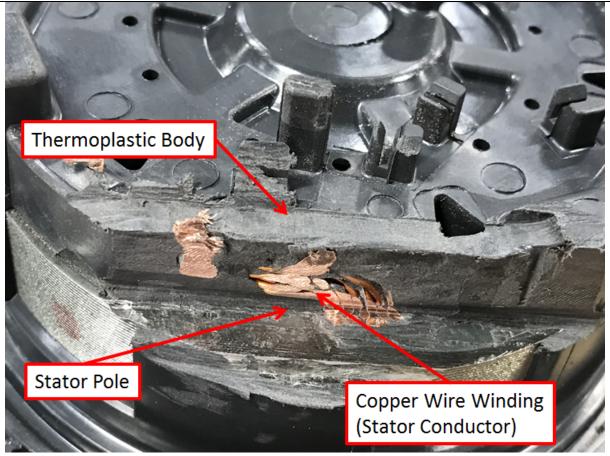
IMG\_1705.JPG

The Aisin Pump also includes a stator. The general location of the stator is shown shaded in red in the photo below:



IMG\_1789.JPG

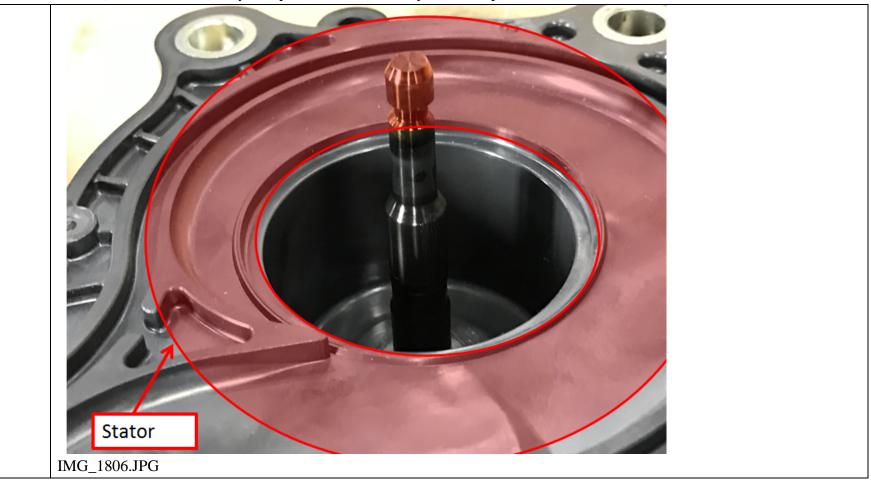
The stator is substantially encapsulated within the body of PPS - GF 30. For example, the photo below shows stator conductors and a stator pole substantially encapsulated within the body of PPS - GF 30:



IMG\_1840.JPG

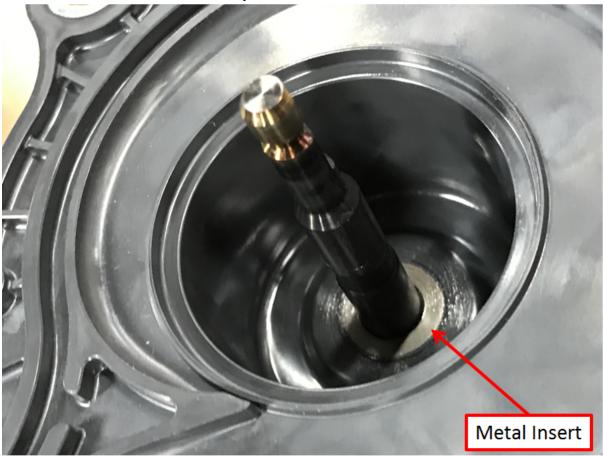
The photo below shows the other side of the Aisin Pump where the rotor sits and depicts how the stator is substantially encapsulated within the body of PPS – GF 30:

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b) one or more solid parts used in the motor either within or near the body; The Aisin Pump comprises one or more solid parts either within or near the body.

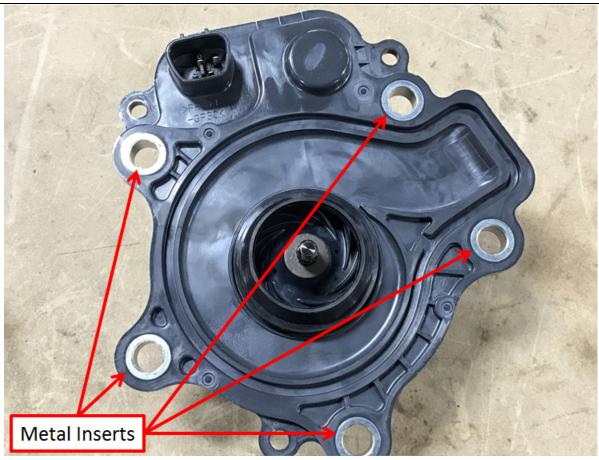
The Aisin Pump includes a number of solid parts within or near the body of PPS – GF 30. For example, the Aisin Pump includes a metal insert within the body of PPS – GF 30:



IMG\_1805.JPG

The Aisin Pump also includes metal inserts within mounting flanges the body of PPS – GF 30:

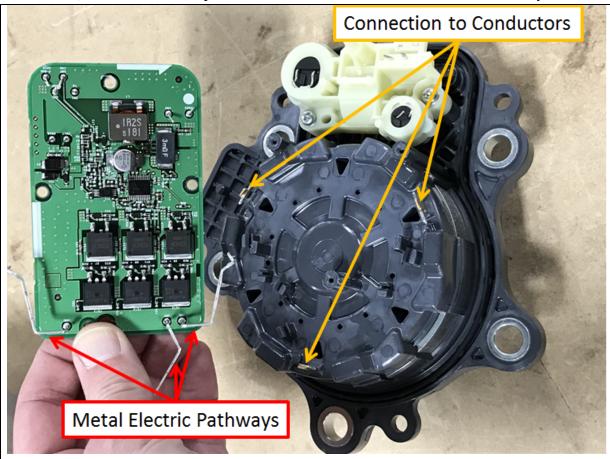
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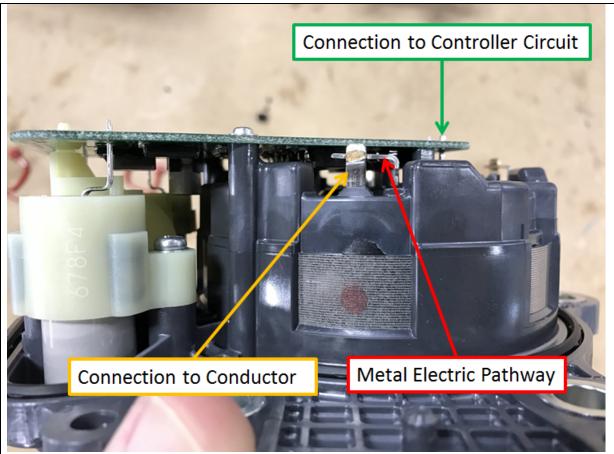
IMG\_1711.JPG

By way of further example, the Aisin Pump includes metal electric pathways and metal connections to conductors both having portions within the body of PPS – GF 30:

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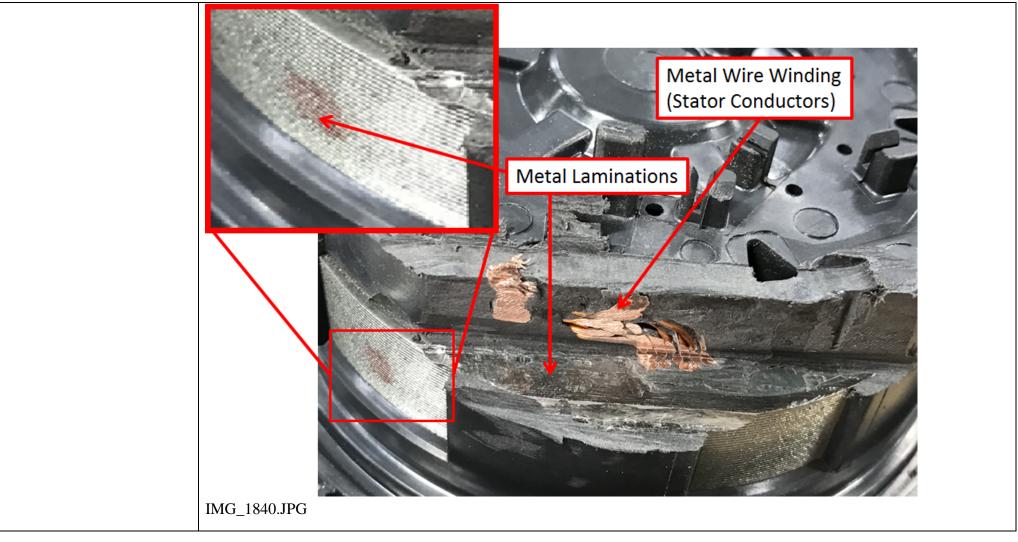
IMG\_1713.JPG



IMG\_1705.JPG

The Aisin Pump further includes metal laminations and metal wire windings as components of the stator substantially encapsulated within the body of PPS – GF 30:

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- "c) the thermoplastic material having a coefficient of linear thermal expansion such that the thermoplastic material contracts and expands at approximately the same rate as the one or more solid parts."
- c) the thermoplastic material having a coefficient of linear thermal expansion such that the thermoplastic material contracts and expands at approximately the same rate as the one or more solid parts.

The Aisin Pump comprises a thermoplastic material having a coefficient of linear thermal expansion such that the thermoplastic material contracts and expands at approximately the same rate as the one or more solid parts.

As explained above, the Aisin Pump includes a body that contains a label "PPS – GF 30," which refers to a thermoplastic material called polyphenylene sulfide with 30% glass fiber filler. The "PPS – GF 30" label on the Aisin Pump denotes that the body of the Aisin Pump is made of this type of thermoplastic material.

The coefficient of linear thermal expansion ("CLTE" or "CTE") is a measurement that describes how the size of an object changes in one dimension (e.g., length) per unit rise in temperature:

Most solid materials expand upon heating and contract when cooled. The change in length with temperature for a solid material can be expressed as:

$$\begin{split} (l_{\rm f}-l_0)/l_0 &= \alpha_1 \; (T_{\rm f}-T_0) \quad \Delta l/l_0 = \alpha_1 \Delta T \\ \alpha_1 &= 1/l(dl/dT) \end{split} \label{eq:lambda}$$

where  $l_0$  and  $l_{\rm f}$  represent, respectively, the original and final lengths with the temperature change from  $T_0$  to  $T_{\rm f}$ . The parameter  $\alpha_1$  CTE and has units of reciprocal temperature (K<sup>-1</sup>) such as  $\mu$ m/m·K or  $10^{-6}$ /K. Conversion factors are:

To convert	То	Multiply by
$10^{-6}$ /K	10 <sup>−6</sup> /°F	0.55556
10−6/°F	$10^{-6}$ /K	1.8
ppm/°C	$10^{-6}$ /K	1
10 <sup>-6</sup> /°C	$10^{-6}$ /K	1
$(\mu m/m)/^{\circ}F$	$10^{-6}$ /K	1.8
(µm/m)/°C	$10^{-6}$ /K	1
$10^{-6}/R$	10-6/K	1.8

The coefficient of thermal expansion is also often defined as the fractional increase in length per unit rise in temperature. The exact definition

http://www.owlnet.rice.edu/~msci301/ThermalExpansion.pdf (downloaded Dec. 6, 2016).

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"c) the thermoplastic material having a coefficient of linear thermal expansion such that the thermoplastic material contracts and expands at approximately the same rate as the one or more solid parts."

PPS – GF30 has a CLTE value similar to that of one or more of the solid (e.g., metal) parts either within or near the body of PPS – GF 30 of the Aisin Pump and, accordingly, contracts and expands at approximately the same rate as those one or more solid parts.

More specifically, PPS – GF 30 is known to possess CLTE values in the range of  $0.50 \times 10^{-5}$  in/in °F to  $2.06 \times 10^{-5}$  in/in °F when heated to temperatures between 212 °F and 392 °F, with an average value of  $1.39 \times 10^{-5}$  in/in °F:

Thermal Properties	Metric	English	Comments
CTE, linear	9.00 - 37.0 μm/m-°C	5.00 - 20.6 μin/in <b>-</b> °F	Average value: 25.0 µm/m-°C Grade Count:8
<u>lh</u>	10.0 - 52.0 μm/m-°C @Temperature 100 - 200 °C	5.56 - 28.9 µin/in-°F @Temperature 212 - 392 °F	Average value: 31.0 µm/m-°C Grade Count:2

http://www.matweb.com/search/datasheet\_print.aspx?matguid=c43bc743bdc0413ead2b87aca2e38a30 (downloaded Dec. 9, 2016)

One or more of the solid parts, such as the metal insert, metal inserts within the mounting flanges, metal electric pathways and metal laminations, are believed to be some type of steel. Steels are known to possess CLTE values within the CLTE range of values of PPS – GF 30, namely from  $0.63 \times 10^{-5}$  in/in °F to  $0.68 \times 10^{-5}$  in/in °F:

Steels			
Material	Coefficient of Thermal Expansion		
Material	10 <sup>-6</sup> (°C) <sup>-1</sup>	10 <sup>-6</sup> (°F) <sup>-1</sup>	
Plain Carbon and Low Alloy Steels			
Steel Alloy A36	11.7	6.5	
Steel Alloy 1020	11.7	6.5	
Steel Alloy 1040	11.3	6.3	
Steel Alloy 4140	12.3	6.8	
Steel Alloy 4340	12.3	6.8	

http://www.amesweb.info/Materials/Linear-Thermal-Expansion-Coefficient-Metals.aspx (downloaded Dec. 9, 2016).

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"c) the thermoplastic material having a coefficient of linear thermal expansion such that the thermoplastic material contracts and expands at approximately the same rate as the one or more solid parts."

The wire windings are believed to be some type of copper. Copper alloys are known to possess CLTE values within the CLTE range of values of PPS – GF 30, namely from  $0.90 \times 10^{-5}$  in/in °F to  $1.14 \times 10^{-5}$  in/in °F:

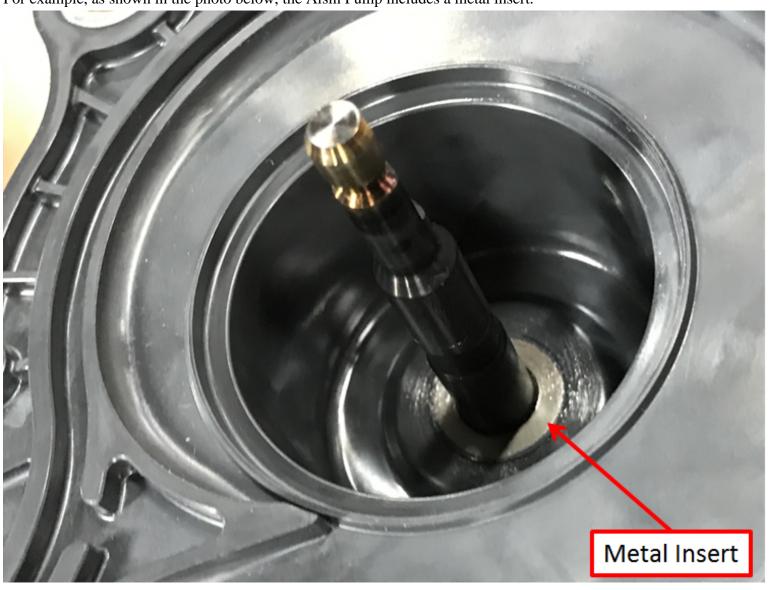
Copper-Base Alloys			
Material	Coefficient of Thermal Expansion		
Material	10 <sup>-6</sup> (°C) <sup>-1</sup>	10 <sup>-6</sup> (°F) <sup>-1</sup>	
Copper Alloy C11000 (electrolytic tough pitch)	17.0	9.4	
Copper Alloy C17200 (beryllium - copper)	16.7	9.3	
Copper Alloy C22000 (Commercial bronze, 90%)	18.4	10.2	
Copper Alloy C23000 (Red brass, 85 %)	18.7	10.4	
Copper Alloy C26000 (cartridge brass)	19.9	11.1	
Copper Alloy C27000 (Yellow Brass)	20.3	11.3	
Copper Alloy C36000 (free - cutting brass)	20.5	11.4	
Copper Alloy C51000 (Phosphor bronze, 5% A)	17.8	9.9	
Copper Alloy C62300 (Aluminum bronze, 9%)	16.2	9.0	
Copper Alloy C71500 (copper - nickel, 30%)	16.2	9.0	
Copper Alloy C93200 (bearing bronze)	18.0	10.0	

 $\underline{http://www.amesweb.info/Materials/Linear-Thermal-Expansion-Coefficient-Metals.aspx} \ (downloaded \ Dec.\ 9,\ 2016).$ 

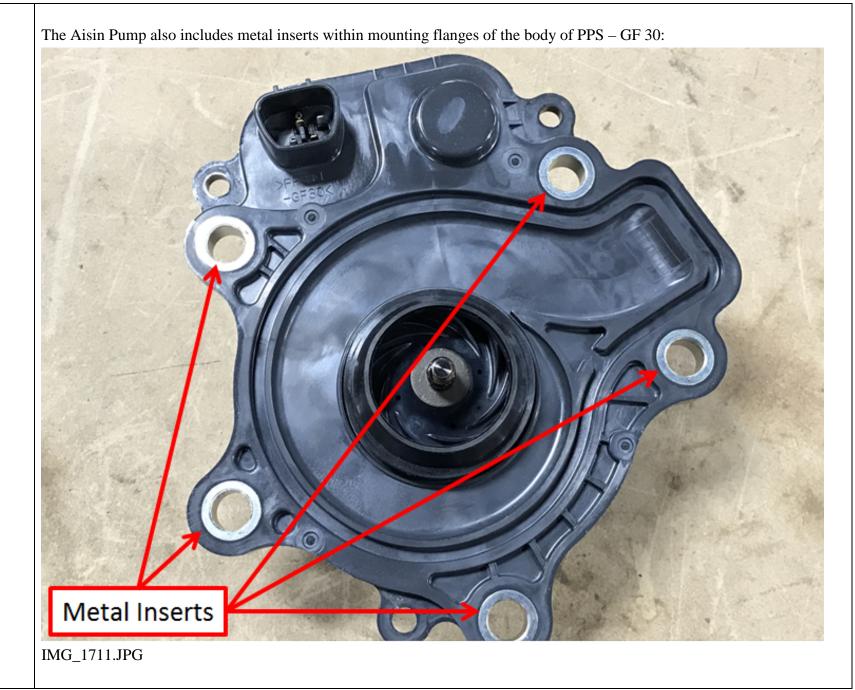
2. The motor of claim 1 wherein the one or more solid parts comprise a metal.

One or more solid parts in the Aisin Pump comprise a metal.

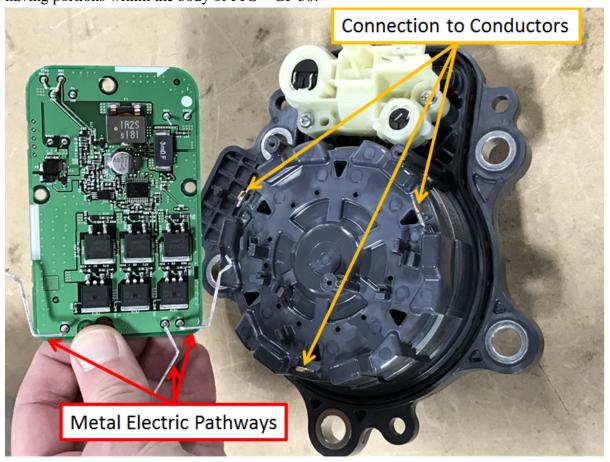
As explained above, the Aisin Pump includes one or more solid parts. The solid parts are believed to be made from metal. For example, as shown in the photo below, the Aisin Pump includes a metal insert.



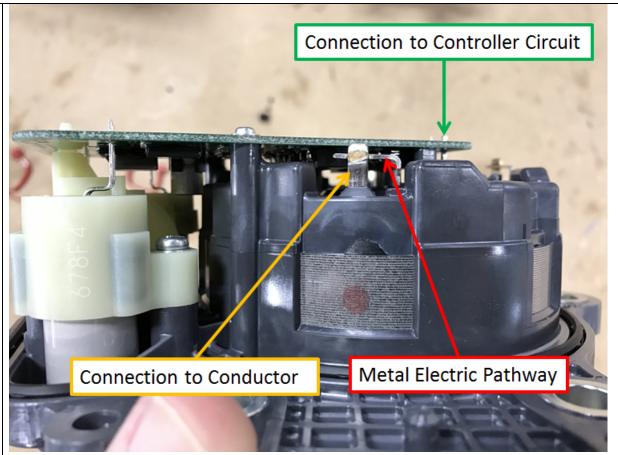
IMG\_1805.JPG



By way of further example, the Aisin Pump includes metal electric pathways and metal connections to conductors both having portions within the body of PPS – GF 30:



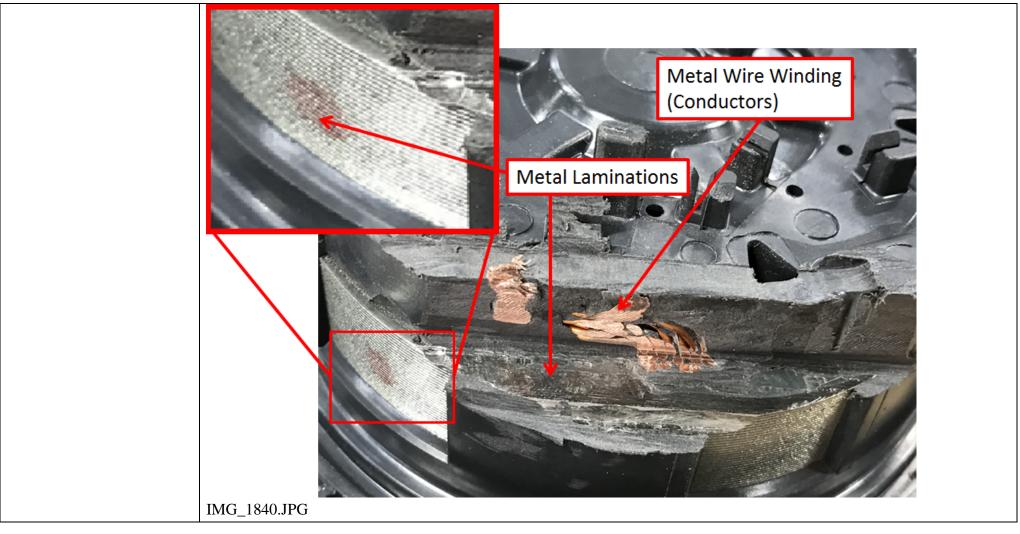
IMG\_1713.JPG



IMG\_1705.JPG

The Aisin Pump further includes metal laminations and metal wire windings as components of the stator substantially encapsulated within the body of PPS – GF 30:

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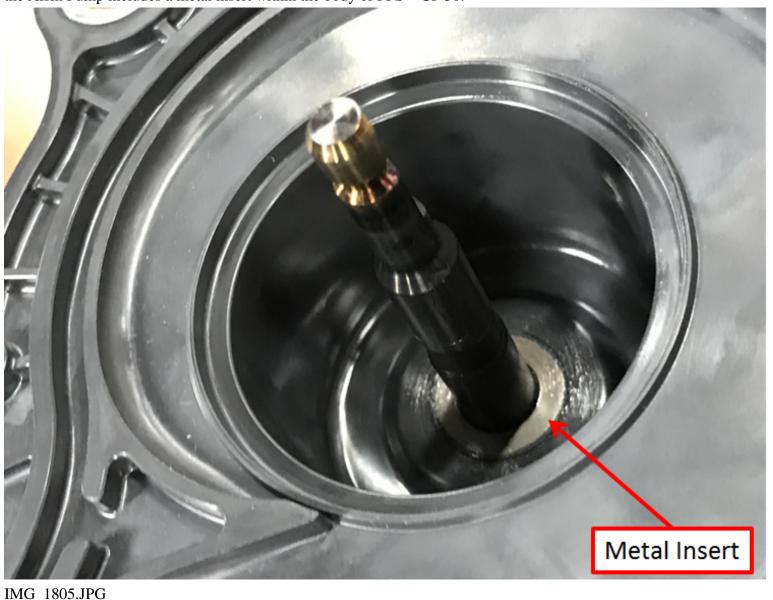
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"4. The motor of claim 1 wherein the one or more solid parts comprise a metal insert molded within the body."

4. The motor of claim 1 wherein the one or more solid parts comprise a metal insert molded within the body.

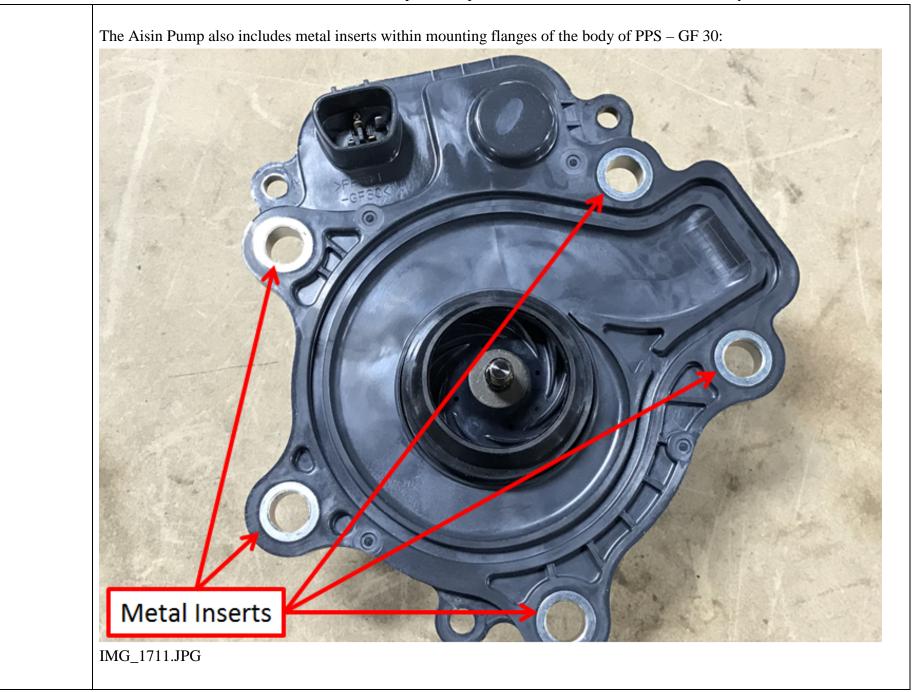
One or more solid parts in the Aisin Pump comprise a metal insert molded within the body.

As explained above, the Aisin Pump includes a number of solid parts within or near the body of PPS – GF 30. For example, the Aisin Pump includes a metal insert within the body of PPS – GF 30:



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"4. The motor of claim 1 wherein the one or more solid parts comprise a metal insert molded within the body."



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"4. The motor of claim 1 wherein the one or more solid parts comprise a metal insert molded within the body." By way of further example, the Aisin Pump includes metal laminations and metal wire windings as components of the stator substantially encapsulated within the body of PPS – GF 30 as shown below: Metal Wire Winding (Stator Conductors) **Metal Laminations** 

IMG\_1840.JPG

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"6. The motor of claim 1 wherein there are a plurality of solid parts that will be either within or near the body, and"

6. The motor of claim 1 wherein there are a plurality of solid parts that will be either within or near the body, and

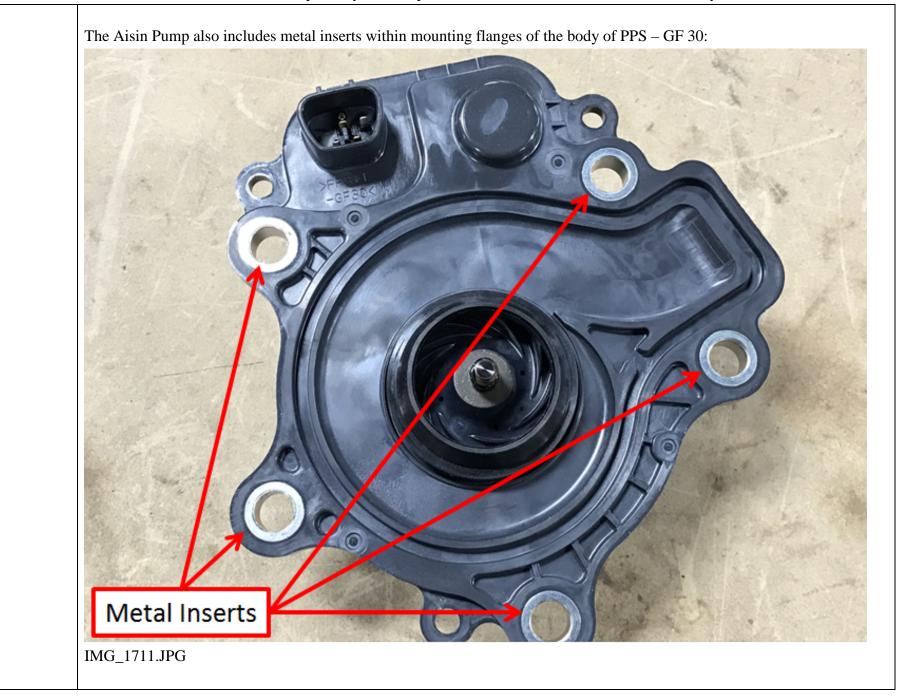
A plurality of the one or more solid parts of the Aisin Pump is either within or near the body.

The Aisin Pump includes a plurality of solid parts within or near the body of PPS – GF 30. For example, the Aisin Pump includes a metal insert within the body of PPS – GF 30:



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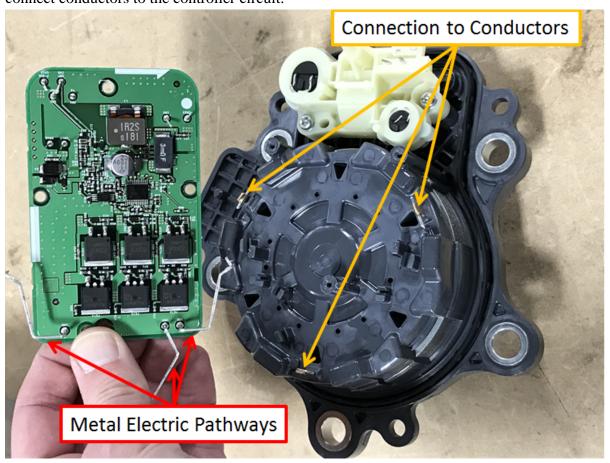
"6. The motor of claim 1 wherein there are a plurality of solid parts that will be either within or near the body, and"



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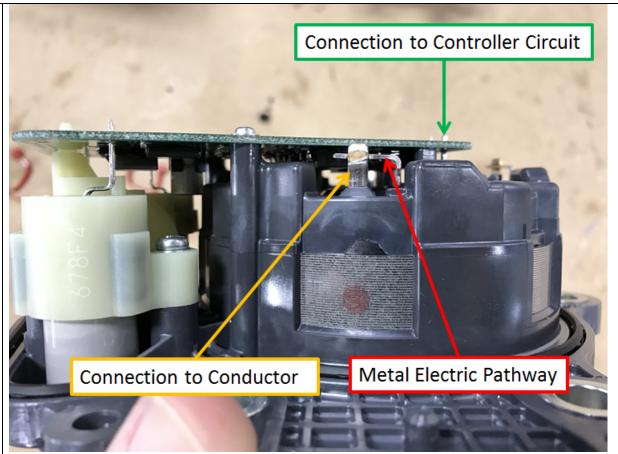
"6. The motor of claim 1 wherein there are a plurality of solid parts that will be either within or near the body, and"

By way of further example, the Aisin Pump includes metal electric pathways attached to the body of PPS – GF 30 that may connect conductors to the controller circuit.



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"6. The motor of claim 1 wherein there are a plurality of solid parts that will be either within or near the body, and"

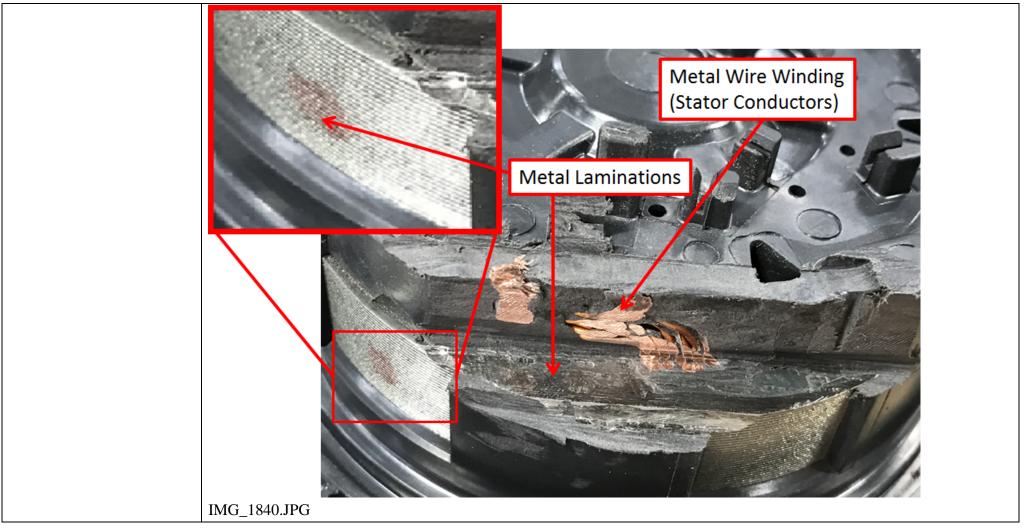


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The Aisin Pump further includes metal laminations and metal wire windings as components of the stator substantially encapsulated within the body of PPS – GF 30:

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"6. The motor of claim 1 wherein there are a plurality of solid parts that will be either within or near the body, and"



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"the solid parts have different coefficients of linear thermal expansion, and"

the solid parts have different coefficients of linear thermal expansion, and The solid parts in the Aisin Pump have different coefficients of linear thermal expansion.

As explained above, the Aisin Pump includes a number of solid metal parts. Two or more of the solid parts are known to possess CLTE values that are different.

As stated above, one or more of the solid parts, such as the metal insert, metal inserts within the mounting flanges, metal electric pathways and metal laminations, are believed to be some type of steel. Steels for example are known to possess CLTE values from  $0.63 \times 10^{-5}$  in/in °F to  $0.68 \times 10^{-5}$  in/in °F:

Steels			
Matarial	Coefficient of Thermal Expansion		
Material	10 <sup>-6</sup> (°C) <sup>-1</sup>	10 <sup>-6</sup> (°F) <sup>-1</sup>	
Plain Carbon and Low Alloy Steels			
Steel Alloy A36	11.7	6.5	
Steel Alloy 1020	11.7	6.5	
Steel Alloy 1040	11.3	6.3	
Steel Alloy 4140	12.3	6.8	
Steel Alloy 4340	12.3	6.8	

http://www.amesweb.info/Materials/Linear-Thermal-Expansion-Coefficient-Metals.aspx (downloaded Dec. 9, 2016).

As stated above, the wire windings are believed to be some type of copper. Copper alloys are known to possess CLTE values from  $0.90 \times 10^{-5}$  in/in °F to  $1.14 \times 10^{-5}$  in/in °F, different from those of steels:

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"the solid parts have different coefficients of linear thermal expansion, and"

Copper-Base Alloys			
Material	Coefficient of Thermal Expansion		
Waterial	10 <sup>-6</sup> (°C) <sup>-1</sup>	10 <sup>-6</sup> (°F) <sup>-1</sup>	
Copper Alloy C11000 (electrolytic tough pitch)	17.0	9.4	
Copper Alloy C17200 (beryllium - copper)	16.7	9.3	
Copper Alloy C22000 (Commercial bronze, 90%)	18.4	10.2	
Copper Alloy C23000 (Red brass, 85 %)	18.7	10.4	
Copper Alloy C26000 (cartridge brass)	19.9	11.1	
Copper Alloy C27000 (Yellow Brass)	20.3	11.3	
Copper Alloy C36000 (free - cutting brass)	20.5	11.4	
Copper Alloy C51000 (Phosphor bronze, 5% A)	17.8	9.9	
Copper Alloy C62300 (Aluminum bronze, 9%)	16.2	9.0	
Copper Alloy C71500 (copper - nickel, 30%)	16.2	9.0	
Copper Alloy C93200 (bearing bronze)	18.0	10.0	

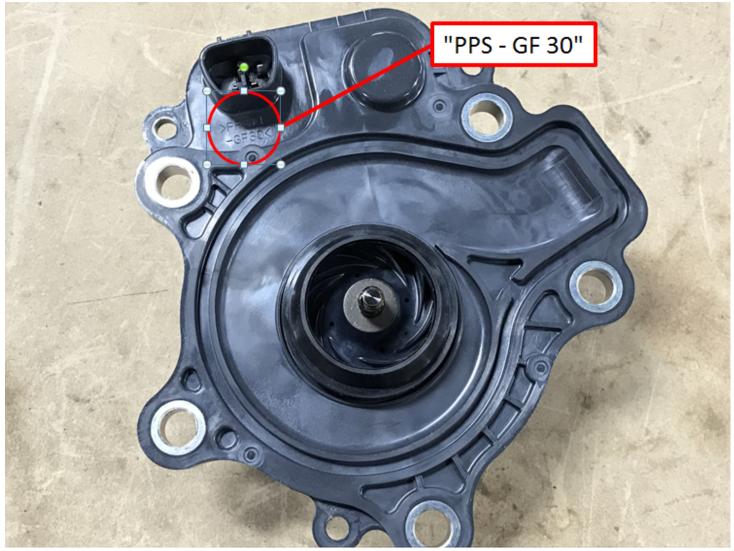
http://www.amesweb.info/Materials/Linear-Thermal-Expansion-Coefficient-Metals.aspx (downloaded Dec. 9, 2016).

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"the thermoplastic material is designed to have a coefficient of linear thermal expansion intermediate the maximum and minimum coefficients of linear thermal expansion of the different solids."

the thermoplastic material is designed to have a coefficient of linear thermal expansion intermediate the maximum and minimum coefficients of linear thermal expansion of the different solids. The thermoplastic material in the Aisin Pump is designed to have a coefficient of linear thermal expansion intermediate the maximum and minimum coefficients of linear thermal expansion of the different solids.

As explained above, the Aisin Pump includes a body of PPS – GF 30:



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"the thermoplastic material is designed to have a coefficient of linear thermal expansion intermediate the maximum and minimum coefficients of linear thermal expansion of the different solids."

PPS – GF 30 is known to possess CLTE values in the range of 0.50 x 10<sup>-5</sup> in/in °F to 2.06 x 10<sup>-5</sup> in/in °F when heated to temperatures between 212 °F and 392 °F, with an average value of 1.39 x 10<sup>-5</sup> in/in °F:

Thermal Properties	Metric	English	Comments
CTE, linear	9.00 - 37.0 μm/m-°C	5.00 - 20.6 µin/in-°F	Average value: 25.0 µm/m-°C Grade Count:8
11.	10.0 - 52.0 μm/m-°C @Temperature 100 - 200 °C	5.56 - 28.9 µin/in-°F @Temperature 212 - 392 °F	Average value: 31.0 μm/m-°C Grade Count:2

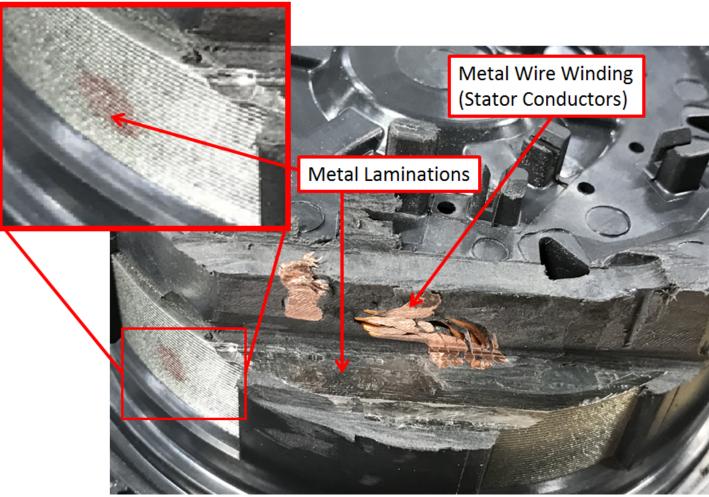
http://www.matweb.com/search/datasheet\_print.aspx?matguid=c43bc743bdc0413ead2b87aca2e38a30 (downloaded Dec. 9, 2016) Also, as indicated above, steels are known to possess a minimum CLTE value of 0.63 x 10<sup>-5</sup> in/in °F and a maximum CLTE value of 0.68 x 10<sup>-5</sup> in/in °F. Because the range of known CLTE values of PPS – GF 30 spans these minimum and maximum CLTE values of steel, it can be said that the body of PPS – GF 30 of the Aisin Pump is known to possess a coefficient of linear thermal expansion intermediate the maximum and minimum coefficients of linear thermal expansion of one or more solid steel parts.

Also, as indicated above, steels are known to possess a minimum CLTE value of 0.63 x 10<sup>-5</sup> in/in °F and a maximum CLTE value of 0.68 x 10<sup>-5</sup> in/in °F and copper alloys are known to possess a minimum CLTE value of 0.90 x 10<sup>-5</sup> in/in °F and a maximum CLTE value of 1.14 x 10<sup>-5</sup> in/in °F. Accordingly, the range of CLTEs intermediate the maximum and minimum CLTEs of the copper and steel solid components of the Aisin Pump extends from at least 0.69 x 10<sup>-5</sup> in/in °F to 0.89 x 10<sup>-5</sup> in/in °F. Moreover, because the range of known CLTE values of PPS – GF 30 extends through this intermediate range of CLTE values, it can be said that the body of PPS – GF 30 of the Actuator is known to possess a coefficient of linear thermal expansion intermediate the maximum and minimum coefficients of linear thermal expansion of the steel and copper solid parts.

7. The motor of claim 6 wherein the different solids comprise steel and copper.

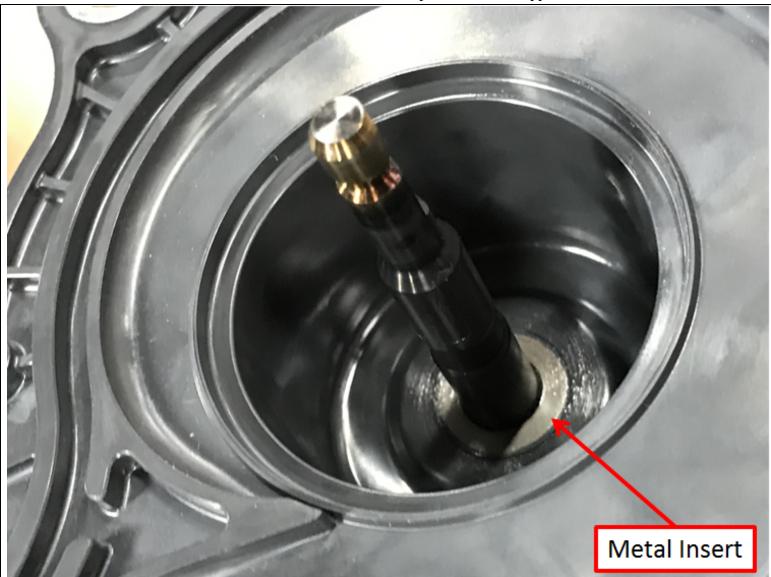
Two or more of the different solid parts in the Aisin Pump comprise steel and copper.

Upon information and belief, two or more solid parts of the Aisin Pump are made from steel and copper. For example, the Aisin Pump includes a stator having metal laminations that are believed to be some type of steel and wire windings that are believed to be some type of copper:



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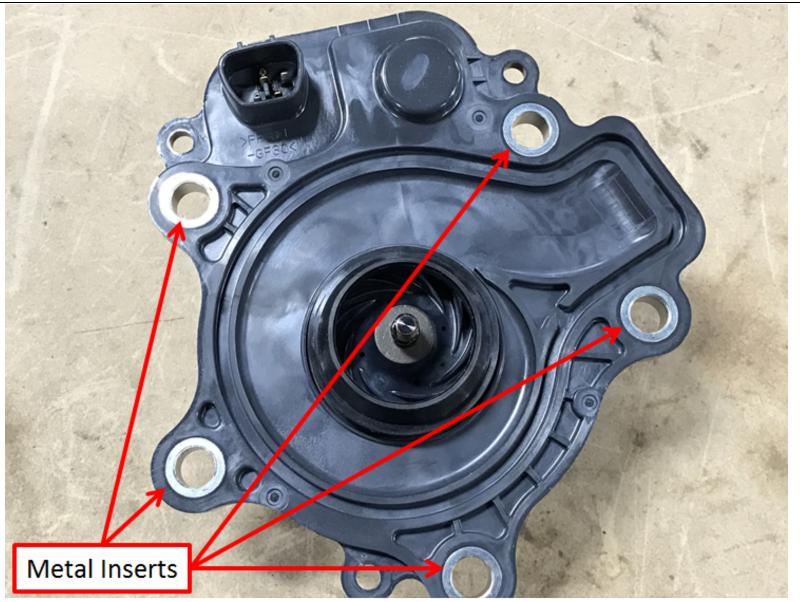
The Aisin Pump includes a metal insert that is also believed to be some type of steel:



IMG\_1805.JPG

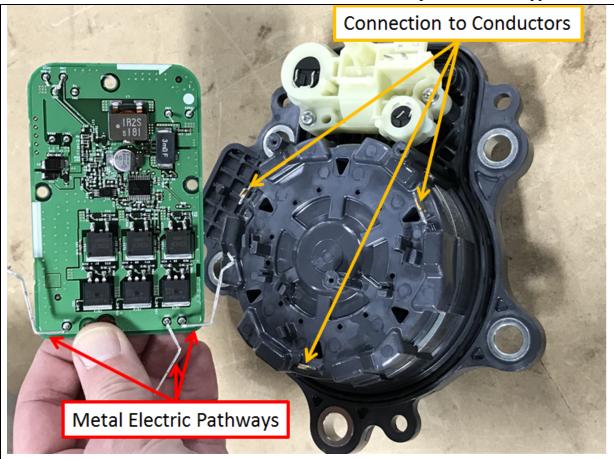
By way of further example, the Aisin Pump includes metal inserts within mounting flanges that are believed to be some type of steel:

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IMG\_1711.JPG

The Aisin Pump further includes metal electrical pathways attached to the body of PPS - GF 30 having portions that are believed to be some type of steel, as well as metal connectors that are believed to be some type of copper:



IMG\_1713.JPG

