

FORD MOTOR COMPANY
Petitioner

V.

PAICE LLC & THE ABELL FOUNDATION
Patent Owner

Case IPR2014-00571 Patent 7,104,347

PATENT OWNER'S RESPONSE TO PETITION



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2. Severinsky does not disclose or render obvious "employing said at least one electric motor to propel said vehicle when the torque RL required to do so is less than said lower level SP"	43
3. Severinsky does not disclose or render obvious "employing said engine to propel said vehicle when the torque RL required to do so is less than said lower level SP and using the torque between RL and SP to drive said at least one electric	4.5
motor to charge said battery"	
 4. Severinsky does not disclose or render obvious a "setpoint". C. Ground 2 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Ehsani Render Obvious the challenged claims. 	
1. Severinsky in view of Ehsani does not render obvious "wherein said controller starts and operates said engine when torque require to be produced by said engine to propel the vehicle and/or to drive either one or both said electric motor(s) to charge said battery is at least equal to a setpoint (SP) above which said engine torque is efficiently produced" as required by claim 1	



2.	Severinsky in view of Ehsani does not render obvious a "setpoint" as required by claim 1	55
3	3. Severinsky in view of Ehsani does not render obvious "wherein said vehicle is operated in a plurality of operating modes responsive to the value for the road load (RL) and said setpoint SP" as required by claim 7	56
4.	Severinsky in view of Ehsani does not render obvious "a highway cruising mode IV, wherein said vehicle is propelled by torque provided by said internal combustion engine, while SP <rl<mto" 7<="" as="" by="" claim="" required="" td=""><td> 57</td></rl<mto">	57
5.	Severinsky in view of Ehsani does not render obvious "a low-load mode I, wherein said vehicle is propelled by torque provided by said second electric motor in response to energy supplied from said battery, while RL <sp" 7<="" as="" by="" claim="" required="" td=""><td> 58</td></sp">	58
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In re Vaidyanathan, 381 Fed. Appx. 985 (Fed. Cir. 2010) (unpublished)	7

EXHIBITS

Patent Owner	Exhibit Description
Exhibit	
Number	
PAICE Ex.	Declaration of Neil Hannemann
2002	
PAICE Ex.	Dr. Gregory W. Davis Deposition Transcript (Jan. 13, 2015)
2003	
PAICE Ex.	Excerpt from File History for U.S. Patent 8,214,097
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