

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY, INC.  
Petitioner

v.

PAICE LLC & THE ABELL FOUNDATION, INC.  
Patent Owner

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Case IPR2014-00579  
Patent 7,104,347

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**PATENT OWNER'S NOTICE OF OBJECTIONS TO EVIDENCE**

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner, Paice and The Abell Foundation, Inc. (“Patent Owner”), hereby submits its notice of objections to certain evidence that Petitioner, Ford Motor Company, Inc. (“Petitioner”), submitted in connection with IPR2014-00579.

### Testimony of Dr. Davis

Patent Owner objects to certain testimony of Dr. Davis submitted as part of Exhibit FORD 1140 (Declaration of Dr. Gregory Davis). Specifically, Patent Owner objects to paragraphs 40, 41, 42, 43, 65, 69, 74, 75 of Exhibit FORD 1140 to the extent Dr. Davis offers factual observations without laying foundation or otherwise demonstrating personal knowledge (FRE 602, 702, 703). Patent Owner objects to the following testimony of Dr. Davis as outside the permitted scope of the reply: paragraphs 63, 64, and 65.

Patent Owner reserves its right to further challenge Dr. Davis’s testimony based on a deposition of Dr. Davis.

### Exhibits

Patent Owner objects to the following exhibits as outside the scope:

- Exhibit 1144

Patent Owner reserves the right to move to exclude the noted testimony and exhibits.

Respectfully submitted,

Date: April 29, 2015

/Timothy W. Riffe/  
Timothy W. Riffe Reg. No. 43,881  
Kevin E. Greene Reg. No. 46,031

## CERTIFICATE OF SERVICE

Pursuant to 37 CFR §§ 42.6(e)(4)(i) *et seq.* and 42.105(b), the undersigned certifies that on April 29, 2015, a complete and entire copy of this Patent Owner's Objections to Evidence was provided via e-mail to Counsel for Petitioner by serving the correspondence address of record as follows:

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