

UNITED STATES PATENT AND TRADEMARK OFFICE

---

BEFORE THE PATENT TRIAL AND APPEAL BOARD

---

FORD MOTOR COMPANY  
Petitioner,

v.

PAICE LLC  
Patent Owner.

---

U.S. Patent No. 7,455,134 to Severinsky et al.

IPR Case No.: IPR2014-00852

---

**PETITIONER'S UPDATED MANDATORY NOTICE  
UNDER 37 C.F.R. § 42.8**

Pursuant to 37 C.F.R. § 42.8, the Petitioner hereby submits the following update to the Mandatory Notice originally provided in the Petition for *Inter Partes* Review of U.S. Patent No. 7,455,134 (“the ‘134 patent”).

### **Related Matters - 37 C.F.R. § 42.8(b)(2)**

Petitioner identifies the following related judicial matter: *Paice, LLC and the Abell Foundation, Inc. v. Ford Motor Company*, Case Number 1-14-cv-00492 filed on February 19, 2014 in the District of Maryland, Baltimore Division. The ‘134 Patent is being asserted in this proceeding, along with four other patents within the same family. On October 8, 2014, the Maryland District Court has issued an order denying the Patent Owner’s motion for a preliminary injunction to enjoin Petitioner from pursuing the present Petition.

Petitioner is also aware that the ‘134 patent is being asserted in *Paice LLC and The Abell Foundation, Inc. v. Hyundai Motor America, Kia Motors Corporation, Hyundai Motor Company and Kia Motors America, Inc.*, Case Number 1:2012-cv-00499, District of Maryland, Baltimore Division filed on February 16, 2012.

Petitioner has filed the following related petitions: IPR2014-00568, IPR2014-00570, IPR2014-00571, IPR2014-01416, IPR2014-00875, IPR2014-00579, IPR2014-00884, IPR2014-01415 and IPR2014-00904.

Respectfully submitted,

Dated: October 20, 2014

/Sangeeta G. Shah/  
Sangeeta G. Shah (Reg. No. 38,614)  
Frank A. Angileri (Reg. No. 36,733)  
Michael D. Cushion (Reg. No. 55,094)  
Andrew B. Turner (Reg. No. 63,121)  
**Brooks Kushman P.C.**  
1000 Town Center, 22nd Floor  
Southfield, MI 48075  
(248) 358-4400

Lissi Mojica (Reg. No. 63,421)  
Kevin Greenleaf (Reg. No. 64,062)  
**Dentons US LLP**  
1530 Page Mill Road; Suite 200  
Palo Alto, CA 94304-1125  
F +1 650 798 0310

*Attorneys for Patent Owner*

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 20, 2014, a complete and entire copy of **Petitioner's Updated Mandatory Notice Under 37 C.F.R. § 42.8**, was served via electronic mail by serving the correspondence email address of record as follows:

LEAD COUNSEL	BACK-UP COUNSEL
Timothy W. Riffe, Reg. No. 43,881 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 Tel: (202) 783-5070 Fax: (202) 783-2331 Email: Riffe@fr.com	Kevin E. Greene, Reg. No. 46,031 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 Tel: (202) 783-5070 Fax: (202) 783-2331 Email: Greene@fr.com

Respectfully submitted,

/Sangeeta G. Shah/  
Sangeeta G. Shah (Reg. No. 38,614)  
Frank A. Angileri (Reg. No. 36,733)  
Michael D. Cushion (Reg. No. 55,094)  
Andrew B. Turner (Reg. No. 63,121)  
**Brooks Kushman P.C.**  
1000 Town Center, 22nd Floor  
Southfield, MI 48075  
(248) 358-4400

Lissi Mojica (Reg. No. 63,421)  
Kevin Greenleaf (Reg. No. 64,062)  
**Dentons US LLP**  
1530 Page Mill Road; Suite 200  
Palo Alto, CA 94304-1125  
F +1 650 798 0310

*Attorneys for Petitioner*