

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC.
Patent Owner.

U.S. Patent No. 7,104,347 to Severinsky *et al.*

IPR Case No.: IPR2014-00884

**REPLY DECLARATION OF DR. GREGORY DAVIS
IN SUPPORT OF PETITIONER'S REPLY**

Updated Exhibit List

Exhibit No.	Description	Date	Identifier
1201	U.S. Patent No. 7,104,347	n/a	The '347 Patent
1202	'347 Patent File History	n/a	'347 Patent File History
1203	Hybrid Power Unit Development for Fiat Multipla Vehicle	Feb. 23, 1998	Caraceni
1204	U.S. Patent No. 5,841,201	Feb. 27 1997	Tabata '201
1205	U.S. Patent No. 6,158,541	Feb. 27 1997	Tabata '541
1206	Plaintiff Paice LLC's Reply Claim Construction Brief (Case No. 2:04-cv-00211)	Mar. 8, 2005	n/a
1207	Plaintiff Paice LLC's Claim Construction Brief (Case No. 2:04-cv-00211)	Mar. 29, 2005	n/a
1208	Claim Construction Order (Case No. 2:04-cv-00211)	Sept. 28, 2005	n/a
1209	Plaintiff Paice LLC's Opening Claim Construction Brief (Case No. 2:07-cv-00180)	June 25, 2008	n/a
1210	Plaintiff Paice LLC's Reply Brief on Claim Construction (Case No. 2:07-cv-00180)	Aug. 1, 2008	n/a
1211	Claim Construction Order (Case No. 2:07-cv-00180)	Dec. 5, 2008	n/a
1212	Plaintiff Paice LLC and Abell Foundation, Inc.'s Opening Claim Construction Brief (Case No. 1:12-cv-00499)	Nov. 14, 2013	n/a
1213	Plaintiff Paice LLC and Abell Foundation, Inc.'s Responsive Brief on Claim Construction (Case No. 1:12-cv-00499)	Dec. 16, 2013	n/a
1214	U.S. Patent Trial and Appeal Board January 3, 2014 Decision (Appeal No. 2011-004811)	Jan. 3, 2014	n/a

Exhibit No.	Description	Date	Identifier
1215	Declaration of Gregory Davis	n/a	Davis
1216	Innovations in Design: 1993 Ford Hybrid Electric Vehicle Challenge	Feb. 1994	Declaration Ex.
1217	1996 Future Car Challenge	Feb. 1997	Declaration Ex.
1218	1997 Future Car Challenge	Feb. 1998	Declaration Ex.
1219	History of the Electric Automobile – Hybrid Electric Vehicles	1998	Declaration Ex.
1220	Hybrid Vehicle for Fuel Economy		Declaration Ex.
1221	Hybrid/Electric Vehicle Design Options and Evaluations	Feb.24-28, 1992	Declaration Ex.
1222	Challenges for the Vehicle Tester in Characterizing Hybrid Electric Vehicles	April 9-11, 1997	Declaration Ex.
1223	Electric and Hybrid Vehicles Program	April 1995	Declaration Ex.
1224	Technology for Electric and Hybrid Vehicles	Feb. 1998	Declaration Ex.
1225	Strategies in Electric and Hybrid Vehicle Design	Feb. 1996	Declaration Ex.
1226	Hybrid Vehicle Potential Assessment	Sept. 30, 1979	Declaration Ex.
1227	Final Report Hybrid Heat Engine / Electric Systems Study	June 1, 1971	Declaration Ex.
1228	Transactions of the Institute of Measurements and Control: A microprocessor controlled gearbox for use in electric and hybrid-electric vehicles	Sept. 1, 1988	Declaration Ex.
1229	Propulsion System Design of Electric Vehicles	1996	Declaration Ex.
1230	Propulsion System Design of Electric and Hybrid Vehicles	Feb. 1997	Declaration Ex.
1231	Bosch Handbook	Oct. 1996	Declaration Ex.
1232	Design Innovations in Electric and Hybrid Electric Vehicles	Feb. 1995	Declaration Ex.
1233	U.S. Patent No. 6,209,672	Apr. 3, 2001	Declaration Ex.
1234	Introduction to Automotive Powertrains (Davis Textbook)	n/a	Declaration Ex.

Exhibit No.	Description	Date	Identifier
1235	Yamaguchi article: Toyota Prius, Automotive Engineering International	Jan. 1998	Declaration Ex.
1236	60/100,095 Provisional Application	Filed Sept. 11, 1998	Declaration Ex.
1237	Amendment in File History of U.S. Patent 8,214,097	Feb. 29, 2012	Declaration Ex.
1238	U.S. Patent No. 6,098,733	Oct. 9, 1996	Declaration Ex.
1239	U.S. Patent No. 6,081,042	Feb. 27 1997	Declaration Ex.
1240	Surface Vehicle Recommended Practice	Dec. 1989	Declaration Ex.
1241	PCT Publication No. WO93/23263	Nov. 25, 1993	Declaration Ex.
1242	Curriculum Vitae of Gregory Davis	n/a	Declaration Ex.
1243	Deposition Transcript of Neil Hannemann for IPR2014-00884	April 30, 2015- May 1, 2015	884 Dep
1244	Exhibit 12 from Deposition Transcript of Neil Hannemann	n/a	
1245	Exhibit 9 from Deposition Transcript of Neil Hannemann	n/a	
1246	Deposition Transcript of Neil Hannemann for IPR2014-00571	April 7, 2015	571 Dep
1247	Deposition Transcript of Neil Hannemann for IPR2014-00875	April 30, 2015	875 Dep
1248	Reply Declaration of Gregory Davis	n/a	Davis Reply
1249	U.S. Patent No. 5,285,862		'862 Patent

I. Introduction

I, Gregory Davis, hereby declare as follows:

1. I previously submitted a declaration on June 5, 2014 at the request of Ford Motor Company in the matter of *inter partes* review of U.S. Patent No. 7,104,347 (“the ’347 Patent”) to Severinsky et al.

2. I confirm that the statements regarding my qualifications, experience and knowledge provided in my Initial Declaration are true and accurate. I also confirm that the opinions stated in my Initial Declaration are based on my personal qualifications, and my experience and knowledge in the automotive field, including my teaching, research, and development experience in the hybrid electric vehicle field. (Ex. 1215 at ¶¶ 5-37, Ex. 1242, *curriculum vitae* of Dr. Gregory Davis.) I have applied those same qualifications to this Reply Declaration.

3. I confirm that the documents cited and used within my Initial Declaration and Reply Declaration are true and accurate copies. I also confirm that the opinions stated in my Initial Declaration and Reply Declaration are based in part on these cited documents, as well as all other cited exhibits.

4. My Initial and Reply Declaration is based, in part, on my review of prior art references referred to as “Caraceni” (Ex. 1203), “Tabata ‘201” (Ex. 1204) and “Tabata ‘541” (*see* Ex. 1215 ¶¶175-198.)

5. I am providing this Reply Declaration in response to arguments presented by the Patent Owner.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.