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 TO PATENT OWNER'S RESPONSE TO PETITION FOR INTER PARTES REVIEW OF U.S. PATENT NO. 7,104,347

Table of Contents

I.	duction1		
	А.	The present petition does not violate the AIA1	
II.	Claim	Construction	
	А. В.	The Board's construction of "setpoint" is correct	
III.	Claims 1, 7, and 8 would have been obvious in view of Caraceni		
	А. В. С. D.	Caraceni discloses turning on the engine by comparing the " <i>torque required to be produced by the engine to propel the vehicle</i> " against a " <i>setpoint</i> "	
IV.	Claim	s 23 and 24 would have been obvious in view of Tabata References	
	А. В.	It is obvious that Tabata '201 employs the engine when the " <i>torque</i> RL required to propel the vehicle' exceeds a " <i>setpoint</i> "	
		been obvious in view of the Tabata references	
	С.	Tabata '541 discloses a "pattern of vehicle operation" 24	
Certif	ficate o	f Service	

Table of Authorities

Cases

K-40 Electronics LLC v. Escort, IPR2013-00240	
Phillips v. AWH Corp., 415 F.3d 1303 (Fed. Cir. 2005)	
Superguide Corp. v. DirecTV Enterprises, Inc., 358 F.3d 870 (Fed. Cir. 2004)	

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	Feb. 1994	Declaration Ex.
	Hybrid Electric Vehicle Challenge		
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.

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