UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner

v.

PAICE LLC & THE ABELL FOUNDATION
Patent Owner

Case IPR2014-00904
Patent 7,237,634

PATENT OWNER'S RESPONSE TO PETITION

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1. Ground 1 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Field and SAE 1996 Discloses or Renders Obvious the Features Recited in Claim 16 26
(a) Severinsky in view of Field and SAE 1996 does not disclose or render obvious "a highway cruising mode IV, wherein, when the SP<the RL<the MTO, the engine is operable to provide torque to propel the hybrid vehicle, and wherein the controller is operable to start the engine if the engine is not running to enter the highway cruising mode IV" 28
i. Severinsky operates the engine to propel the vehicle based on speed, not road load (RL) 29
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(b) Severinsky in view of Field and SAE 1996 does not disclose or render obvious "a low-load mode I, wherein, when the RL<the SP, the second electric motor is operable to provide torque to propel the hybrid vehicle" 50

(c) Severinsky in view of Field and SAE 1996 does not disclose or render obvious a "setpoint" 53

2. Ground 1 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Field and SAE 1996 Discloses or Renders Obvious the Features Recited in Claim 1 55

(a) Severinsky in view of Field and SAE 1996 does not disclose or render obvious "wherein the controller is operable to operate the engine when torque required from the engine to propel the hybrid vehicle and/or to drive one or more of the first or the second motors to charge the battery is at least equal to a setpoint (SP) above which the torque produced by the engine is efficiently produced" 55

(b) Severinsky in view of Field and SAE 1996 does not render obvious a "setpoint" as required by claim 1 58

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EXHIBITS

Patent Owner Exhibit Number	Exhibit Description
PAICE Ex. 2001	Arbitration Agreement between Paice LLC and Ford Motor Company
PAICE Ex. 2002	Memorandum Opinion, U.S. District Court for the District of Maryland, U.S. District Judge William D. Quarles, Jr.
PAICE Ex. 2003	Declaration in support of pro hac vice motion
PAICE Ex. 2004	Declaration of Neil Hannemann
PAICE Ex. 2005	Dr. Gregory W. Davis Deposition Transcript (Jan. 13, 2015)
PAICE Ex. 2006	Excerpt from File History for U.S. Patent 8,214,097
PAICE Ex. 2007	"Integrated Microprocessor Control of a Hybrid i.c. Engine/Battery-Electric Automotive Power Train," P.W. Masding, J.R. Bumby, Jan. 1990
PAICE Ex. 2008	Masding, Philip Wilson (1988) "Some drive train control problems in hybrid i.c engine/battery electric vehicles," Durham theses, Durham University
PAICE Ex. 2009	Excerpt from McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Ed., 2003.
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