

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY, INC.
Petitioner

v.

PAICE LLC & THE ABELL FOUNDATION, INC.
Patent Owner

Case IPR2014-00904
Patent 7,237,634

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 IPR2014-00904.

Testimony of Dr. Davis

Patent Owner objects to certain testimony of Dr. Davis submitted as part of Exhibit FORD 1044 (Declaration of Dr. Gregory Davis). Specifically, Patent Owner objects to paragraphs 8-17, 21-23, and 27-29 of Exhibit FORD 1044 to the extent Dr. Davis offers factual observations without laying foundation or otherwise demonstrating personal knowledge (FRE 602, 702, 703).

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

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

Respectfully submitted,

Date: May 22, 2015

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

