

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZHONGSHAN BROAD OCEAN MOTOR CO., LTD.;
BROAD OCEAN MOTOR, LLC; AND
BROAD OCEAN TECHNOLOGIES, LLC
Petitioners

v.

NIDEC MOTOR CORPORATION
Patent Owner

Case IPR2014-01121¹
Patent 7,626,349

**PETITIONERS' RESPONSE TO
PATENT OWNER'S OBJECTIONS TO
PETITIONERS' DEMONSTRATIVE EXHIBITS**

¹ Case IPR2015-00762 has been joined with this proceeding.

In response to Patent Owner's objections to Petitioner's demonstrative exhibits DX 3 and DX 46, Petitioner notes that the subject matter disclosed in these slides relate to the disclosure of the "demanded torque" control signal and the "airflow control loop" recited in proposed claims 21-23 in the prior art of record U.S. Patent No. 7,342,379 (see Ex. 3001 in IPR2014-01121 and Ex. 1010 in IPR2015-00762), which Patent Owner ignored in its Conditional Motion to Amend (Paper 73), but addressed for the first time in its Reply (Paper 80 at pp. 8-10). See Patent Owner's demonstrative exhibit PO 31.

Respectfully submitted,

Dated: February 21, 2016

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CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. §42.6(e) and 37 C.F.R. §42.105(b), the undersigned hereby certifies that on February 21, 2016, a complete and entire copy of the foregoing **Petitioners' Response To Patent Owner's Objections To Petitioners' Demonstrative Exhibits** was electronically served in its entirety on the Patent Owner of record (as agreed upon by counsel) at sbrown@hoveywilliams.com, mwalters@hoveywilliams.com, and litigation@hoveywilliams.com.

Additionally, the undersigned certifies that on February 21, 2016, a complete and entire copy of this **Petitioners' Response To Patent Owner's Objections To Petitioners' Demonstrative Exhibits** was electronically served on the Patent Owner's below-listed counsel of record at jschwent@thompsoncoburn.com, djinkins@thompsoncoburn.com, and syoo@thompsoncoburn.com, in the co-pending litigation *Nidec Motor Corporation v. Broad Ocean Motor LLC et al.*, Civil Action No. 4:13-CV-01895-JCH (E.D. Mo.), as agreed upon by the parties.

Dated: February 21, 2016

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