

Filed on Behalf of Nidec Motor Corporation

IPR2014-01121

By: Scott R. Brown
Matthew B. Walters
HOVEY WILLIAMS LLP
10801 Mastin Blvd., Suite 1000
Overland Park, Kansas 66210
Tel: (913) 647-9050
Fax: (913) 647-9057

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 No. IPR2014-01121
U.S. Patent No. 7,626,349

Before BENJAMIN D.M. WOOD, *Administrative Patent Judge*
JAMES A. TARTAL, *Administrative Patent Judge*
PATRICK M. BOUCHER, *Administrative Patent Judge*

PATENT OWNER'S APPENDIX OF EXHIBITS

Exhibit	Description	Statement of Relevance	Filed
2001	Protective Order	Stipulated Protective Order	<input checked="" type="checkbox"/>
2002	Protective Order	Markup of Differences Between Stipulated Protective Order and Default Protective Order	<input checked="" type="checkbox"/>
2003	Carrier Declaration	Declaration of Mark E. Carrier relating to nonobviousness of claimed invention	<input checked="" type="checkbox"/>
2004	Goodman Presentation	Evidence cited by Declaration of Mr. Carrier Entitled "Goodman Business Alignment & Technology Review"	<input checked="" type="checkbox"/>
2005	Trane Presentation	Evidence cited by Declaration of Mr. Carrier Entitled "Variable Speed Motor Program Update"	<input checked="" type="checkbox"/>
2006	Filla Declaration	Declaration of John Filla relating to nonobviousness of claimed invention	<input checked="" type="checkbox"/>
2007	Market and Sales Spreadsheet	Evidence cited by Declaration of Mr. Filla	<input checked="" type="checkbox"/>
2008	Ehsani Deposition	Excerpts from the Deposition Transcript of Mark Ehsani, Ph.D., taken April 24, 2015	<input checked="" type="checkbox"/>
2009	Chen Patent	U.S. Patent 6,498,449 to Chen et al. ("Chen")	<input checked="" type="checkbox"/>
2010	Bokhart Declaration	Declaration of Christopher J. Bokhart relating to commercial success of claimed invention	<input checked="" type="checkbox"/>
2011	Bokhart Schedules	Curriculum Vitae and Supporting Schedules for the Declaration of Mr. Bokhart	<input checked="" type="checkbox"/>
2012	Bokhart Exhibit	About Us, Nidec found at (http://www.nidec-motor.com/About-Us.aspx)	<input checked="" type="checkbox"/>
2013	Bokhart Exhibit	Company History, Nidec found at (http://www.nidec-motor.com/About-Us/Company-History.aspx)	<input checked="" type="checkbox"/>
2014	Bokhart Exhibit	Nidec to Buy Emerson Unit, The Wall Street Journal found at (http://www.wsj.com/articles/SB10001424052748704554104575436600918551826)	<input checked="" type="checkbox"/>

Exhibit	Description	Statement of Relevance	Filed
2015	Bokhart Exhibit	Company Overview, Nidec found at (http://www.nidec-motor.com/About-Us/Company-Overview.aspx)	☒
2016	Bokhart Exhibit	Zhongshan Broad-Ocean Motor Co., Ltd. found at (https://www.capitaliq.com/CIQDotNet/company.aspx?companyId=45977574)	☒
2017	Bokhart Exhibit	Company Profile, Broad-Ocean website found at (http://www.broad-ocean.com/en/introduce.html)	☒
2018	Bokhart Exhibit	HVAC Equipment Market – Global Industry Analysis, Size, Share, Growth, Trends, and Forecast 2012-2018, PR Newswire (9/3/2013) found at (http://www.prnewswire.com/news-releases/hvac-equipment-market---global-industry-analysis-size-share-growth-trends-and-forecast-2012---2018-222161181.html)	☒
2019	Bokhart Exhibit	HVAC Market Report, Gruppo BPC, 2014 found at (http://www.slideshare.net/gruppobpc/abstract-market-reporthvacusa2014eng)	☒
2020	Bokhart Exhibit	Comparing Motor Technologies, The News (12/14/2009) found at (http://www.achrnews.com/articles/112674-comparing-motor-technologies)	☒
2021	Bokhart Exhibit	Evaluation of Retrofit Variable-Speed Furnace Fan Motors, U.S. Department of Energy p. 1 (January 2014) found at (http://www.nrel.gov/docs/fy14osti/60760.pdf)	☒
2022	Bokhart Exhibit	Using ECM Motors in HVAC Systems, Thomasnet.com (2015) found at (http://www.thomasnet.com/articles/machinery-tools-supplies/ECM-Motors-HVAC-Systems)	☒

Exhibit	Description	Statement of Relevance	Filed
2023	Bokhart Exhibit	Super Premium” Efficiency Motors are Now Available, Washington State University (2010)	<input checked="" type="checkbox"/>
2024	Bokhart Exhibit	Rescue® EcoTech® Direct Drive Blower Motor, The High Efficiency “ECM/BPM” Drop-in Replacement Blower Motor. Nidec Motor Corporation.	<input checked="" type="checkbox"/>
2025	Bokhart Exhibit	History, Regal Beloit found at (http://www.regalbeloit.com/who-we-are/our-company/history.aspx).	<input checked="" type="checkbox"/>
2026		Reserved.	
2027		Reserved.	
2028		Reserved.	
2029	Exhibit Objections	Patent Owner’s Objections to Petitioner’s Exhibits 1013-107, 1020, 1022-1026, 1028, 1031-1032, 1034-1036, and 1038	<input checked="" type="checkbox"/>
2030	Hu Deposition	Deposition of Ge Hu taken on September 9, 2015	<input checked="" type="checkbox"/>
2031	Hofmann Deposition	Deposition of Ivan Hofmann taken on September 11, 2015	<input checked="" type="checkbox"/>
2032	Kessler Deposition	Deposition of Alan Kessler taken on September 17, 2015	<input checked="" type="checkbox"/>

Respectfully Submitted,

Dated: September 21, 2015

/s/ Scott R. Brown
 Scott R. Brown, Reg. No. 40,535
 Matthew B. Walters, Reg. No. 65,343
 HOVEY WILLIAMS LLP
 10801 Mastin Blvd., Suite 1000
 Overland Park, Kansas 66210
 Tel: (913) 647-9050
 Fax: (913) 647-9057
srb@hoveywilliams.com
mbw@hoveywilliams.com

ATTORNEYS FOR PATENT OWNER

CERTIFICATE OF SERVICE

On September 21, 2015, a true and accurate copy of the foregoing *Patent Owner's Appendix of Evidence* was filed through the Patent Review Processing System and served on the following counsel for Petitioners via electronic mail:

Steven F. Meyer
Charles Baker
LOCKE LORD LLP
Three World Financial Center
New York, New York 10281-2101
Tel: (212) 415-8535

smeyer@lockelord.com
cbaker@lockelord.com

/s/ Scott R. Brown