

Filed on Behalf of Nidec Motor Corporation

IPR2014-01121

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UNITED STATES PATENT AND TRADEMARK OFFICE  
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BEFORE THE PATENT TRIAL AND APPEAL BOARD  
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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**

| <b>Exhibit</b> | <b>Description</b>           | <b>Statement of Relevance</b>   | <b>Filed</b>                        |
|----------------|------------------------------|---|-------------------------------------|
| 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 ( <a href="http://www.nidec-motor.com/About-Us.aspx">http://www.nidec-motor.com/About-Us.aspx</a> )  | <input checked="" type="checkbox"/> |
| 2013           | Bokhart Exhibit              | Company History, Nidec found at ( <a href="http://www.nidec-motor.com/About-Us/Company-History.aspx">http://www.nidec-motor.com/About-Us/Company-History.aspx</a> )   | <input checked="" type="checkbox"/> |
| 2014           | Bokhart Exhibit              | Nidec to Buy Emerson Unit, The Wall Street Journal found at ( <a href="http://www.wsj.com/articles/SB10001424052748704554104575436600918551826">http://www.wsj.com/articles/SB10001424052748704554104575436600918551826</a> ) | <input checked="" type="checkbox"/> |

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

| <b>Exhibit</b> | <b>Description</b>          | <b>Statement of Relevance</b>   | <b>Filed</b>                        |
|----------------|-----------------------------|---|-------------------------------------|
| 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 ( <a href="http://www.regalbeloit.com/who-we-are/our-company/history.aspx">http://www.regalbeloit.com/who-we-are/our-company/history.aspx</a> ). | <input checked="" type="checkbox"/> |
| 2026           | Carrier Exhibit             | True and accurate depictions of the images of wave forms of the Practicing Nidec Motors.  | <input checked="" type="checkbox"/> |
| 2027           | Carrier Exhibit             | Excerpt from the Simulink model used to code the digital signal processors of the Practicing Nidec Motors.  | <input checked="" type="checkbox"/> |
| 2028           | Carrier Exhibit             | ANSI/ASHRAE Standard 37-2005 entitled “Methods of Testing for Rating Electrically Driven Unitary Air-Conditioning and Heat Pump Equipment”.                                     | <input checked="" type="checkbox"/> |
| 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"/> |
| 2033           | Revised Carrier Declaration | Revised Declaration of Mark E. Carrier relating to nonobviousness of claimed invention  | <input checked="" type="checkbox"/> |
| 2034           | Revised Bokhart Declaration | Revised Declaration of Christopher J. Bokhart relating to commercial success of claimed invention   | <input checked="" type="checkbox"/> |
| 2035           | Revised Bokhart Schedules   | Revised Curriculum Vitae and Supporting Schedules for the Declaration of Mr. Bokhart  | <input checked="" type="checkbox"/> |

| Exhibit | Description    | Statement of Relevance   | Filed                               |
|---------|----------------|--|-------------------------------------|
| 2036    | Service Letter | Correspondence service supplemental evidence dated June 1, 2015. | <input checked="" type="checkbox"/> |

Respectfully Submitted,

Dated: September 25, 2015

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ATTORNEYS FOR PATENT OWNER

### **CERTIFICATE OF SERVICE**

On September 25, 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:

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