IPR2014-01121

Filed on Behalf of Nidec Motor Corporation 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. IPR2014-01121¹ 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

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

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

Exhibit	Description	Statement of Relevance	Filed
	_	(http://www.wsj.com/articles/SB100014240	
		<u>52748704554104575436600918551826</u>)	
2015	Bokhart	Company Overview, Nidec found at	X
	Exhibit	(http://www.nidec-motor.com/About-	
		Us/Company-Overview.aspx)	
2016	Bokhart	Zhongshan Broad-Ocean Motor Co., Ltd.	\boxtimes
	Exhibit	found at	
		(https://www.capitaliq.com/CIQDotNet/co	
		mpany.aspx?companyId=45977574)	
2017	Bokhart	Company Profile, Broad-Ocean website	X
	Exhibit	found at (<u>http://www.broad-</u>	
		ocean.com/en/introduce.html)	
2018	Bokhart	HVAC Equipment Market – Global	\mathbf{X}
	Exhibit	Industry Analysis, Size, Share, Growth,	
		Trends, and Forecast 2012-2018, PR	
		Newswire (9/3/2013) found at	
		(<u>http://www.prnewswire.com/news-</u>	
		releases/hvac-equipment-marketglobal-	
		industry-analysis-size-share-growth-trends-	
		and-forecast-20122018-222161181.html)	
2019	Bokhart	HVAC Market Report, Gruppo BPC, 2014	\mathbf{X}
	Exhibit	found at	
		(http://www.slideshare.net/gruppobpc/abstra	
		ct-market-reporthvacusa2014eng)	
2020	Bokhart	Comparing Motor Technologies, The News	\mathbf{X}
	Exhibit	(12/14/2009) found at	
		(http://www.achrnews.com/articles/112674-	
		<u>comparing-motor-technologies</u>)	
2021	Bokhart	Evaluation of Retrofit Variable-Speed	\mathbf{X}
	Exhibit	Furnace Fan Motors, U.S. Department of	
		Energy p. 1 (January 2014) found at	
		(http://www.nrel.gov/docs/fy14osti/60760.p	
		<u>df</u>)	
2022	Bokhart	Using ECM Motors in HVAC Systems,	\mathbf{X}
	Exhibit	Thomasnet.com (2015) found at	
		(http://www.thomasnet.com/articles/machin	
		ery-tools-supplies/ECM-Motors-HVAC-	
		<u>Systems</u>)	

Exhibit	Description	Statement of Relevance	Filed
2023	Bokhart	Super Premium" Efficiency Motors are	X
	Exhibit	Now Available, Washington State	
		University (2010)	
2024	Bokhart	Rescue® EcoTech® Direct Drive Blower	X
	Exhibit	Motor, The High Efficiency "ECM/BPM"	
		Drop-in Replacement Blower Motor. Nidec	
		Motor Corporation.	
2025	Bokhart	History, Regal Beloit found at	X
	Exhibit	(http://www.regalbeloit.com/who-we-	
		are/our-company/history.aspx).	
2026	Carrier	True and accurate depictions of the images	X
	Exhibit	of wave forms of the Practicing Nidec	
		Motors.	
2027	Carrier	Excerpt from the Simulink model used to	X
	Exhibit	code the digital signal processors of the	
		Practicing Nidec Motors.	
2028	Carrier	ANSI/ASHRAE Standard 37-2005 entitled	X
	Exhibit	"Methods of Testing for Rating Electrically	
		Driven Unitary Air-Conditioning and Heat	
		Pump Equipment".	
2029	Exhibit	Patent Owner's Objections to Petitioner's	\boxtimes
	Objections	Exhibits 1013-107, 1020, 1022-1026, 1028,	
		1031-1032, 1034-1036, and 1038	
2030	Hu Deposition	Deposition of Ge Hu taken on September 9,	\boxtimes
		2015	
2031	Hofmann	Deposition of Ivan Hofmann taken on	\boxtimes
	Deposition	September 11, 2015	
2032	Kessler	Deposition of Alan Kessler taken on	\boxtimes
	Deposition	September 17, 2015	
2033	Revised	Revised Declaration of Mark E. Carrier	
	Carrier	relating to nonobviousness of claimed	\boxtimes
	Declaration	invention	
2034	Revised	Revised Declaration of Christopher J.	\boxtimes
	Bokhart	Bokhart relating to commercial success of	
	Declaration	claimed invention	
2035	Revised	Revised Curriculum Vitae and Supporting	\boxtimes
	Bokhart	Schedules for the Declaration of Mr.	
	Schedules	Bokhart	

Exhibit	Description	Statement of Relevance	Filed
2036	Service Letter	Correspondence service supplemental	\boxtimes
		evidence dated June 1, 2015.	
2037	Ehsani	Deposition Transcript of Mark Ehsani,	\mathbf{X}
	Deposition	Ph.D., taken November 19, 2015	
2038	Blank	Declaration of Gary Blank, Ph.D.	\boxtimes
	Declaration		

Respectfully Submitted,

Dated: December 16, 2015

/s/ Scott R. Brown

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