

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner

v.

PAICE LLC & THE ABELL FOUNDATION
Patent Owner

Case IPR2014-01415
Patent 8,214,097

**DECLARATION OF NEIL HANNEMANN
IN SUPPORT OF THE PATENT OWNER'S RESPONSE**

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a) Severinsky and Anderson do not disclose the controller claimed in claims 1, 11, and 2157

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d) Severinsky in view Anderson does not disclose or render obvious the motor mode of claims 1, 11, or 2196

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3. Severinsky does not disclose or suggest claim 34118

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DECLARATION EXHIBITS

Patent Owner Exhibit Number	Exhibit Description
PAICE Ex. 2103	IPR2014-01415, Jeffery L. Stein, Deposition Tr. (May 29, 2015)
PAICE Ex. 2104	Jeffery L. Stein, Deposition Tr. (Mar. 3, 2015)
PAICE Ex. 2105	Jeffery L. Stein, Deposition Tr. (May 29, 2015)
PAICE Ex. 2106	Jeffery L. Stein, Deposition Tr. (Jan. 12, 2015)
PAICE Ex. 2107	Jeffery L. Stein, Deposition Tr. (May 8, 2015)
PAICE Ex. 2108	Gregory Davis, Deposition Tr. (Jan. 13, 2015)
PAICE Ex. 2109	Gregory Davis, Deposition Tr. (Feb. 25, 2015)
PAICE Ex. 2110	Neil Hannemann CV
PAICE Ex. 2111	McGraw Hill Dictionary Scientific 2003

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