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

FORD MOTOR COMPANY Petitioner

V.

PAICE LLC & THE ABELL FOUNDATION, INC.

Patent Owner

Case IPR2014-01415

Patent 8,214,097

Patent Owner's Response to Petition for *Inter Partes* Review of U.S. Patent No. 8,214,097



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	C.	Severinsky and Anderson do not disclose a "controller such that combustion of fuel within the engine occurs at a substantially stoichiometric ratio"		



	D.	Ground 1 is Defective Because Severinsky in view of Anderson Fails to Disclose the "setpoint"-based Modes of Operation Recited in Claims 1, 11, and 21
		1. Ford Misapplies Severinsky to Claims 1, 11, and 2121
		2. Severinsky and Anderson Fail to Disclose the Modes of Operation Recited in Claims 1, 11, and 21
		3. Statements made in the '097 Patent regarding Severinsky do not remedy the above-mentioned deficiencies
		4. Severinsky in view of Anderson does not disclose or render obvious a "setpoint"
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	A.	Takaoka fails to disclose a "controller" that limits engine output torque to maintain stoichiometry
		1. Severinsky does not disclose the limiting that rate of change limitations
		2. Takaoka discloses an underpowered engine
		3. Takaoka does not limit the rate of change of engine output torque to achieve stoichiometry
		4. Takaoka at best discloses limiting engine output <i>power</i> , not torque



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