

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 IPR2014-01416
Patent 7,237,634

**PATENT OWNER'S
RESPONSE TO PETITION**

TABLE OF CONTENTS

I. INTRODUCTION 1

II. CLAIM CONSTRUCTION..... 2

 A. The District Courts’ Construction..... 2

 1. “Setpoint” is used to mark a transition between operating modes 3

 2. “Setpoint” is not “predetermined” and is not limited to torque values 6

III. DEFECTS IN THE INSTITUTED GROUNDS OF UNPATENTABILITY 6

 A. Grounds 1 and 2 are Defective Because Ford Misapplies Severinsky to the Challenged Claims 7

 B. Ground 2 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Frank Discloses or Renders Obvious the Features Recited in the Challenged Claims 16

 1. Ground 2 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Frank Discloses or Renders Obvious the Features Recited in Claim 80 16

 (a) Severinsky in view of Frank does not disclose or render obvious “wherein said operating the internal combustion engine to propel the hybrid vehicle is performed when: the RL>the SP for at least a predetermined time; or the RL>a second setpoint (SP2), wherein the SP2 is a larger percentage of the MTO than the SP” 18

 (b) Severinsky in view of Frank does not disclose or render obvious “operating an internal combustion engine of the hybrid vehicle to propel the hybrid vehicle when the RL required to do so is between the SP and a maximum torque output (MTO) of the engine...” 24

 i. Severinsky operates the engine to propel the vehicle based on speed, not road load (RL)..... 25

 ii. Severinsky does not compare the road load to a setpoint (SP) 33

 iii. Statements made in the ’634 Patent regarding Severinsky do not remedy the above-mentioned deficiencies..... 38

 (c) Severinsky in view of Frank does not disclose or render obvious “operating at least one electric motor to propel the hybrid vehicle when the RL required to do so is less than a setpoint (SP)” 44

 (d) Severinsky in view of Frank does not disclose or render obvious a “setpoint” 46

2.	Ground 2 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Frank Discloses or Renders Obvious the Features Recited in Claim 114	48
C.	Ground 1 is Defective Because Ford Has Failed to Demonstrate that Severinsky Discloses or Renders Obvious the Features Recited in the Challenged Claims	49
1.	Independent Claim 161.....	49
2.	Independent Claim 215.....	50
D.	Ground 3 is Defective Because Ford Has Failed to Demonstrate that Tabata '201 Discloses or Renders Obvious the Features Recited in the Challenged Claims	51
1.	Tabata '201 does not disclose or suggest the use of “road load” or “setpoint” as required by claim 215.....	51
IV.	CONCLUSION.....	60

TABLE OF AUTHORITIES

	Page(s)
Cases	
<i>Clearwater Sys. Corp. v. Evapco, Inc.</i> , 394 F. App'x 699, 705 (Fed. Cir. 2010).....	43, 44
<i>Fuji Photo Film Co. v. Int'l Trade Comm'n</i> , 386 F.3d 1095 (Fed. Cir. 2004).....	6
<i>KSR Int'l Co. v. Teleflex Inc.</i> , 550 U.S. 398 (2007).....	22, 54
<i>PharmaStem Therapeutics, Inc. v. Viacell, Inc.</i> , 491 F.3d 1342 (Fed. Cir. 2007).....	44

EXHIBITS

Patent Owner Exhibit Number	Exhibit Description
PAICE Ex. 2101	Declaration in support of pro hac vice motion
PAICE Ex. 2102	Dr. Gregory W. Davis Deposition Transcript (June 3, 2015)
PAICE Ex. 2103	Excerpt from Neil Hannemann Deposition Transcript (April 7, 2015)
PAICE Ex. 2104	Declaration of Neil Hannemann
PAICE Ex. 2105	Dr. Gregory W. Davis Deposition Transcript (Jan. 13, 2015)
PAICE Ex. 2106	Excerpt from File History for U.S. Patent 8,214,097
PAICE Ex. 2107	Integrated Microprocessor Control of a Hybrid i.c. Engine/Battery-Electric Automotive Power Train,” P.W. Masding, J.R. Bumby, Jan. 1990
PAICE Ex. 2108	Masding, Philip Wilson (1988) “Some drive train control problems in hybrid i.c engine/battery electric vehicles,” Durham theses, Durham University
PAICE Ex. 2109	Excerpt from McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Ed., 2003.
PAICE Ex. 2110	Neil Hannemann CV
PAICE Ex. 2111	“Hybrid Power Unit Development for Fiat Multipla Vehicle,” by A. Caraceni, G. Cipolla, and R. Barbiero, SAE Publication 981124 (1998)
PAICE Ex. 2112	Dr. Gregory W. Davis Deposition Transcript (May 8, 2015)

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