

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC.
Patent Owner.

U.S. Patent No. 7,237,634

IPR Case No.: IPR2014-01416

**REPLY TO PATENT OWNER'S RESPONSE TO PETITION
FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,237,634**

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III. A POSA would have understood that Severinsky '970 teaches the engine, motor and setpoint limitations of the claims at issue, and therefore teaches “when” to operate the engine and motor3

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Table of Authorities

Cases

Clearwater Systems Corp. v. Evapco, Inc.,
394 Fed. Appx. 699 (Fed. Cir. 2010)8, 9

Clearwater Systems Corp. v. Evapco, Inc.,
596 F.Supp.2d 291 (D. Conn. 2009)8

Constant v. Advanced Micro–Devices, Inc.,
848 F.2d 1560 (Fed. Cir. 1988)8

PharmaStem Therapeutics, Inc. v. Viacell, Inc.,
491 F.3d 1342 (Fed. Cir. 2007)8

Rules

37 CFR 1.104(c)(3)8

MPEP 22588

Updated Exhibit List

Exhibit No.	Description	Date	Identifier
1101	U.S. Patent No. 7,237,634	n/a	The '634 Patent
1102	7,237,634 File History	n/a	'634 Patent File History
1103	U.S. Patent No. 5,343,970	Sept. 6, 1994	Severinsky '970
1104	U.S. Patent No. 5,842,534	Nov.3, 1997	Frank
1105	U.S. Patent No. 5,841,201	Feb. 27 1997	Tabata '201
1106	U.S. Patent No. 6,158,541	Jan. 26, 1998	Tabata '541
1107	Declaration of Gregory Davis	n/a	Davis
1108	2005 Paice Opening Claim Construction Brief	Mar. 8, 2005	
1109	2005 Paice Response Claim Construction Brief	Mar. 29, 2005	
1110	2005 Claim Construction Order	Sept. 28, 2005	
1111	2008 Paice Opening Brief	June 25, 2008	
1112	2008 Paice Response Brief	Aug. 1, 2008	
1113	2008 Claim Construction Order	Dec. 5, 2008	
1114	2013 Paice Opening Claim Construction Brief	Nov. 14, 2013	
1115	2013 Paice Response Claim Construction Brief	Dec. 16, 2013	
1116	2014 Paice Claim Construction Order		
1117	Excerpt of USPN 7,104,347 File History	n/a	'347 Patent File History
1118	U.S. Patent Trial and Appeal Board January 3, 2014 Decision (Appeal No. 2011-004811)	Jan. 3, 2014	
1119	2012 Amendment to U.S. Application 13/065,704	Feb. 29, 2012	
1120	Curriculum Vitae of Gregory Davis		
1121	Innovations in Design: 1993 Ford Hybrid Electric Vehicle Challenge	Feb. 1994	
1122	1996 Future Car Challenge	Feb. 1997	

...

Exhibit No.	Description	Date	Identifier
1123	1997 Future Car Challenge	Feb. 1998	
1124	History of Hybrid Electric Vehicle (Wakefield-1998)	1998	
1125	SAE 760121 (Unnewehr-1976)		
1126	SAE 920447 (Burke-1992)	Feb. 24-28, 1992	
1127	Vehicle Tester for HEV (Duoba-1997)	April 9-11, 1997	
1128	DOE Report to Congress (1994)	April 1995	
1129	SAE SP-1331 (1998)	Feb. 1998	
1130	SAE SP-1156 (1996)	Feb. 1996	
1131	DOE HEV Assessment (1979)	Sept. 30, 1979	
1132	EPA HEV Final Study (1971)	June 1, 1971	
1133	Microprocessor Design for HEV (Bumby-1988)	Sept. 1, 1988	
1134	Propulsion System for Design for EV (Ehsani-1996)	1996	
1135	Propulsion System Design for HEV (Ehsani-1997)	Feb. 1997	
1136	Bosch Automotive Handbook (1996)	Oct. 1996	
1137	SAE SP-1089 (Anderson-1995)	Feb. 1995	
1138	U.S. Patent No. 6,209,672	Apr. 3, 2001	
1139	Introduction to Automotive Powertrain (Davis)		
1140	Toyota Prius (Yamaguchi-1998)	Jan. 1998	
1141	US Application 60/100,095	Filed Sept. 11, 1998	
1142	WO 9323263A1 (Field)	Nov. 25, 1998	
1143	U.S. Patent No. 6,098,733	Oct.13, 1995	
1144	Critical Issues in Quantifying HEV Emissions and Fuel Consumption (An-1998)	August 11, 1998	
1145	Excerpts from Patent Owner Response (IPR2014-00571, Doc 8)	July 11, 2014	
1146	Excerpts from Patent Owner Response (IPR2014-00579, Doc 8)	July 11, 2014	

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