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 IPR2015-00722 Patent 7,237,634

#### PATENT OWNER'S **RESPONSE TO PETITION**



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	B.	Claim Construction	
		1. "setpoint (SP)"	
		2. "operating at least one electric motor to propel the hybrid vehicle when the RL required to do so is less than a setpoint (SP)" / "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" / "operating both the at least one electric motor and the engine to propel the hybrid vehicle when the torque RL required to do so is more than the MTO"	
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	В.	Ground 1-3 are Deficient—Ford Has Failed to Demonstrate that Ibarak '882 Discloses or Renders Obvious the Features Recited in the Challenged Claims	
		1. Ibaraki '882 does not compare "road load" to "setpoint"1	
		2. Ibaraki '882 does not compare "road load" to "MTO"3	
		3. Ibaraki '882 does not disclose a setpoint that is substantially les than MTO	
	C.	Ground 2 is Deficient—Ford Fails to Establish a Motivation to Combine Ibaraki '882 with Ibaraki '626	
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