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 to Severinsky et al. IPR Case No.: IPR2015-00758

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



Case No: IPR2015-00758 Attorney Docket No. FPGP0104IPR4

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	A. Setpoint B. Paice seeks to amend each independent claim to include "a comparison of the RL to a setpoint (SP) results in a determination that"		
III.	Ford's petition properly establishes unpatentability under 35 U.S.C. § 103		
IV.	Ford is not estopped from maintaining its challenges to dependent claims 81-90, 115-124, 162-171, 216-225		
V.	As the Board has previously found, Severinsky discloses "when" to operate the engine based on "RL", i.e., the "torque required to propel the vehicle"		
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VII.	As the Board has found, the combination of Severinsky and Frank discloses the hysteresis limitations	9	
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In re Pearson, 494 F.2d 1399 (C.C.P.A. 1974)	5
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Constant v. Advanced Micro–Devices, Inc., 848 F.2d 1560 (Fed. Cir. 1988)	13
Clearwater Systems Corp. v. Evapco, Inc., 596 F.Supp.2d 291 (D. Conn. 2009)	13
Clearwater Systems Corp. v. Evapco, Inc., 394 Fed. Appx. 699 (Fed. Cir. 2010)	13



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Updated List of Exhibits

Exhibit	Description	Date	Identifier
No.	-		
1201	U.S. Patent No. 7,237,634	July 3, 2007	'634 Patent
1202	7,237,634 File History	n/a	'634 Patent File
			History
1203	U.S. Patent No. 5,343,970	Sept. 6, 1994	Severinsky
1204	U.S. Patent No. 5,842,534	Nov. 3, 1997	Frank
1205	Ford Letter to Paice	Sept. 2014	
1206	U.S. Patent No. 7,104,347	Sep. 12, 2006	
1207	Declaration of Gregory Davis		Davis
1208	2005 Paice Opening Claim	Mar. 8, 2005	
	Construction Brief		
1209	2005 Paice Response Claim	Mar. 29, 2005	
	Construction Brief		
1210	2005 Claim Construction Order	Sept. 28, 2005	
1211	2008 Paice Opening Brief	June 25, 2008	
1212	2008 Paice Response Brief	Aug. 1, 2008	
1213	2008 Claim Construction Order	Dec. 5, 2008	
1214	2013 Paice Opening Claim	Nov. 14, 2013	
	Construction Brief		
1215	2013 Paice Response Claim	Dec. 16, 2013	
	Construction Brief		
1216	2014 Paice Claim Construction	July 24, 2014	
	Order		
1217	Excerpt of USPN 7,104,347 File	n/a	'347 Patent File
	History		History
1218	U.S. Patent Trial and Appeal	Jan. 3, 2014	
	Board January 3, 2014 Decision		
	(Appeal No. 2011-004811)		
1219	2012 Amendment to U.S.	Feb. 29, 2012	
	Application 13/065,704		
1220	Curriculum Vitae of Gregory		
	Davis		
1221	Innovations in Design: 1993 Ford	Feb. 1994	
	Hybrid Electric Vehicle Challenge		
1222	1996 Future Car Challenge	Feb. 1997	
1223	1997 Future Car Challenge	Feb. 1998	



Exhibit	Description	Date	Identifier
No.			
1224	History of Hybrid Electric Vehicle (Wakefield-1998)	1998	
1225	SAE 760121 (Unnewehr-1976)	1976	
1226	SAE 920447 (Burke-1992)	Feb. 24-28, 1992	
1227	Vehicle Tester for HEV (Duoba-1997)	Apr. 9-11, 1997	
1228	DOE Report to Congress (1994)	Apr. 1995	
1229	SAE SP-1331 (1998)	Feb. 1998	
1230	SAE SP-1156 (1996)	Feb. 1996	
1231	DOE HEV Assessment (1979)	Sept. 30, 1979	
1232	EPA HEV Final Study (1971)	June 1, 1971	
1233	Microprocessor Design for HEV (Bumby -1988)	Sept. 1, 1988	
1234	Propulsion System for Design for EV (Ehsani-1996)	1996	
1235	Propulsion System Design for HEV (Ehsani-1997)	Feb. 1997	
1236	Bosch Automotive Handbook (1996)	Oct. 1996	
1237	SAE SP-1089 (Anderson-1995)	Feb. 1995	
1238	IPR 2014-00904 Decision	Dec. 12, 2014	
1239	Introduction to Automotive Powertrain (Davis)		
1240	Toyota Prius (Yamaguchi-1998)	Jan. 1998	
1241	US Application 60/100,095	Filed Sept. 11, 1998	
1242	WO 9323263A1 (Field)	Nov. 25, 1998	Field
1243	IPR 2014-00571 Petition	Apr. 4, 2014	
1244	Critical Issues in Quantifying HEV Emissions and Fuel Consumption (An-1998)	Aug. 11, 1998	
1245	Excerpts from Patent Owner Response (IPR2014-00571, Doc 8)	July 11, 2014	



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