

PUBLIC – REDACTED VERSION

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 IPR2014-00568
Patent 7,455,134

**Patent Owner's Preliminary Response to
Petition for *Inter Partes* Review of U.S. Patent
No. 7,455,134**

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Patent Owner Response

Case IPR2014-00568
Attorney Docket No: 36351-0012IP1

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 A. Ground 1A is defective because Ford has failed to establish that there is a reasonable likelihood that the '455 PCT publication discloses “*a ratio of maximum DC voltage ... to current supplied from said electrical storage device to at least said first AC-DC converter, when maximum current is so supplied, is at least 2.5,*” as recited in independent claims 1 and 58..... 18

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EXHIBITS

Exhibit Number	Exhibit Name
2001	Arbitration Agreement between Paice LLC and Ford Motor Company

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