

STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY  
Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC.  
Patent Owner.

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

IPR Case No.: IPR2015-00785

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**PETITIONER'S RESPONSE TO PATENT OWNER'S  
MOTION FOR OBSERVATIONS ON CROSS EXAMINATION**

**Updated List of Exhibits**

<b>Exhibit No.</b>	<b>Description</b>	<b>Identifier</b>
1351	U.S. Patent No. 7,237,634 issued to Severinsky <i>et al.</i> (July 3, 2007)	'634 Patent
1352	Declaration of Jeffery L. Stein, Ph.D.	Stein
1353	Paice LLC v. Ford Motor Company, Case No. 1:14-cv-00492, District of MD, Baltimore Div., Complaint (Feb. 19, 2014) (Ex. 1353 at 2-51.)  Service (Feb. 25, 2014) (Ex. 1353 at 1.)  Letter from Ford to Paice (Sept. 22, 2014) (Ex. 1353 at 52.)	Ford Litigation
1354	U.S. Patent No. 5,343,970 issued to Severinsky (Sept. 6, 1994)	Severinsky '970
1355	Catherine Anderson & Erin Pettit, <i>The Effects of APU Characteristics on the Design of Hybrid Control Strategies for Hybrid Electric Vehicles</i> , SAE Technical Paper 950493, published as part of Society of Automotive Engineers Special Publication, <i>DESIGN INNOVATIONS IN Electric AND Hybrid Electric Vehicles</i> , SAE SP-1089 (February, 1995) (available at <a href="http://papers.sae.org/950493/">http://papers.sae.org/950493/.</a> )	Anderson
1356	U.S. Patent No. 5,823,280 issued to Lateur <i>et al.</i> (Oct. 20, 1998)	Lateur
1357	U.S. Patent No. 5,842,534 issued to Frank (Dec. 1, 1998)	Frank
1358	USPN 7,237,634 File History	'634 File History
1359	Toshifumi Takaoka et al., <i>A High-Expansion Ratio Gasoline Engine for the Toyota Hybrid System</i> , published as part of Toyota Technical Review, <i>Prevention of Global Warming</i> , Vol. 47, No. 2 (Toyota Motor Corporation, April 1998) (Ex. 1359 at 1-8.) (available at: <a href="https://www.worldcat.org/title/a-high-expansion-ratio-gasoline-engine-for-the-toyota-hybrid-system/oclc/205516653&amp;referer=brief_results.">https://www.worldcat.org/title/a-high-expansion-ratio-gasoline-engine-for-the-toyota-hybrid-system/oclc/205516653&amp;referer=brief_results.</a> )  Declaration of Walt Johnson and Exhibit A (Dec. 23, 2014) (Ex.1359 at 9-19.)	Takaoka

Exhibit No.	Description	Identifier
1360	USPN 7,104,347 File History Excerpts	'347 File History
1361	<p>Paice LLC v. Toyota Motor Corp. et al., Case No. 2:04-cv-211, E.D. Texas, Paice Opening Claim Construction Brief (Mar. 8, 2005) (Ex. 1361 at 1-40.)</p> <p>Paice Claim Construction Reply Brief (Mar. 29, 2005) (Ex. 1361 at 41-79.)</p> <p>Claim Construction Order (Sept. 28, 2005) (Ex. 1361 at 80-130.)</p> <p>Paice LLC v. Toyota Motor Corp. et al., Case No. 2:07-cv-180 (Paice Opening Claim Construction Brief (June 25, 2008) (Ex. 1361 at 131-165.)</p> <p>Paice Claim Construction Reply Brief (Aug. 1, 2008) (Ex. 1361 at 166-191.)</p> <p>Claim Construction Order (Dec. 5, 2008) (Ex. 1361 at 192-220.)</p>	Toyota Litigation
1362	<p>Paice LLC v. Hyundai Motor Corp. et al., Case No. 1:12-cv-0499, District of MD, Baltimore Div., Paice Opening Claim Construction Brief (Nov. 14, 2013) (Ex. 1362 at 1-37.)</p> <p>Paice Responsive Brief on Claim Construction (Dec. 16, 2013) (Ex. 1362 at 38-81.)</p> <p>Claim Construction Order (Ex. 1362 at 82-122.)</p>	Hyundai Litigation

Exhibit No.	Description	Identifier
1363	<p>Decision of Institution, IPR2014-00570, Paper 10 (Sept. 30, 2014) (Ex. 1363 at 1-13.)</p> <p>Excerpts from Public Patent Owner Preliminary Response, IPR2014-00571, Paper 11, (July 11, 2014) (Ex. 1363 at 14-23.)</p> <p>Excerpts from Public Patent Owner Preliminary Response, IPR2014-00579, Paper 11, (July 11, 2014) (Ex. 1363 at 24-33.)</p> <p>Decision of Institution, IPR2014-00571, Paper 12, (Sept. 30, 2014) (Ex. 1363 at 34-50.)</p> <p>Decision of Institution, IPR2014-00579, Paper 12, (Sept. 30, 2014) (Ex. 1363 at 51-64.)</p> <p>Decision of Institution, IPR2014-00904, Paper 13, (Dec. 12, 2014) (Ex. 1363 at 65-78.)</p> <p>Excerpts from Public Patent Owner Preliminary Response, IPR2014-01415, Paper 9, (Dec. 16, 2014) (Ex. 1363 at 79-96.)</p> <p>Patent Owner Response, IPR2014-00571, Paper 20 (January 21, 2015) (Ex. 1363 at 97-162.)</p> <p>Patent Owner Response, IPR2014-00579, Paper 20 (January 21, 2015) (Ex. 1363 at 163-226.)</p> <p>Patent Owner Response, IPR2014-00570, Paper 22 (January 21, 2015) (Ex. 1363 at 227-292.)</p>	Ford IPRs
1364	U.S. Patent No. 7,104,347 issued to Severinsky <i>et al.</i> (Sep. 12, 2006)	'347 Patent
1365	Curriculum Vitae of Jeffery L. Stein	Jeff Stein CV
1366	<p>John B. Heywood, <i>Internal Combustion Engine Fundamentals</i> (McGraw-Hill 1988) (available at <a href="http://catalog.loc.gov/vwebv/holdingsInfo?searchId=20946&amp;recCount=25&amp;recPointer=4&amp;bibId=2421798">http://catalog.loc.gov/vwebv/holdingsInfo?searchId=20946&amp;recCount=25&amp;recPointer=4&amp;bibId=2421798</a>.)</p>	Heywood

Exhibit No.	Description	Identifier
1367	Willard W. Pulkrabek, <i>Engineering Fundamentals of the Internal Combustion Engine</i> (Prentice Hall, 1997) (available at <a href="http://catalog.loc.gov/vwebv/holdingsInfo?searchId=10003&amp;recCount=25&amp;recPointer=1&amp;bibId=2109503">http://catalog.loc.gov/vwebv/holdingsInfo?searchId=10003&amp;recCount=25&amp;recPointer=1&amp;bibId=2109503</a> .)	Pulkrabek
1368	Hawley, G.G., <i>The Condensed Chemical Dictionary</i> , Van Nostrand Reinhold Co., 9th ed. (1977) (available at <a href="http://catalog.loc.gov/vwebv/holdingsInfo?searchId=21541&amp;recCount=25&amp;recPointer=14&amp;bibId=1289584">http://catalog.loc.gov/vwebv/holdingsInfo?searchId=21541&amp;recCount=25&amp;recPointer=14&amp;bibId=1289584</a> .)	Hawley
1369	U.S. Patent No. 913,846 issued to Pieper (Mar. 2, 1909)	Pieper
1370	Michael Duoba, Ctr. for Transp. Research, Argonne Nat'l Lab., <i>Challenges for the Vehicle Tester in Characterizing Hybrid Electric Vehicles</i> , 7th CRC on Road Vehicle Emissions Workshop (April 1997) (available at <a href="http://www.osti.gov/scitech/biblio/516019">http://www.osti.gov/scitech/biblio/516019</a> .)	Duoba
1371	Society of Automotive Engineers Special Publication, <i>Technology for Electric and Hybrid Vehicles</i> , SAE SP-1331 (February 1998) (available at <a href="http://www.worldcat.org/title/technology-for-electric-and-hybrid-vehicles/oclc/39802642">http://www.worldcat.org/title/technology-for-electric-and-hybrid-vehicles/oclc/39802642</a> .)	SP-1331
1372	Yamaguchi et al., <i>Development of a New Hybrid System – Dual System</i> , SAE Technical Paper 960231, published as part of Society of Automotive Engineers Special Publication, <i>Strategies in Electric and Hybrid Vehicle Design</i> , SAE SP-1156, (February 1996) (available at <a href="http://www.worldcat.org/title/strategies-in-electric-and-hybrid-vehicle-design-sae-special-publication-sp-1156-a-collection-of-papers-presented-for-sessions-at-the-1996-sae-international-congress-and-exposition/oclc/312822989?ht=edition&amp;referer=di">http://www.worldcat.org/title/strategies-in-electric-and-hybrid-vehicle-design-sae-special-publication-sp-1156-a-collection-of-papers-presented-for-sessions-at-the-1996-sae-international-congress-and-exposition/oclc/312822989?ht=edition&amp;referer=di</a> ; and <a href="http://papers.sae.org/960231/">http://papers.sae.org/960231/</a> .)	Yamaguchi Paper
1373	U.S. Patent No. 3,888,325 issued to Reinbeck (June 10, 1975)	Reinbeck
1374	U.S. Patent No. 4,335,429 issued to Kawakatsu (June 15, 1982)	Kawakatsu

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