

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.: IPR2015-00791

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

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 A. Ibaraki ’882 discloses operating the engine/motor when the
 “road load” is above/below a “setpoint”4

 1. Paice’s power argument is not based on the figures nor
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 2. Fig. 5 of Ibaraki ’882 discloses mode selection based on
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 3. Even if Ibaraki is power-based, the challenged claims are
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 B. Ibaraki ’882 discloses operating the motor and engine “when
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 1. Fig. 5 discloses operating the motor and engine when
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Updated List of Exhibits

Exhibit No.	Description	Date	Identifier
1450	U.S. Patent No. 7,237,634	July 3, 2007	'634 Patent
1451	Ford Letter to Paice	Sept. 2014	
1452	US Patent 5,789,882	Aug. 4, 1998	Ibaraki '882
1453	US Patent 6,003,626	Dec. 21, 1999	Ibaraki '626
1454	US Patent 5,623,104	Apr. 22, 1997	Suga
1455	Declaration of Gregory Davis		Davis
1456	Toyota Litigations	2005	Toyota Litigation
1457	Hyundai Litigation	2013-2014	Hyundai Litigation
1458	PTAB Decisions & Preliminary Response in 2014-00571		Ford IPRs
1459	7,237,634 File History (certified)	n/a	'634 Patent File History
1460	Excerpt of USPN 7,104,347 File History	n/a	'347 File History
1461	US Patent 7,104,347	Sept. 12, 2006	'347 Patent
1462	Fundamentals of Vehicle Dynamics (Gillespie)	1992	Gillespie
1463	SAE 760121 (Unnewehr-1976)	Feb. 1, 1976	Unnewehr
1464	Microprocessor Design for HEV (Bumby-1988)	Sept. 1, 1988	Bumby/Masding 1988
1465	SAE SP-1331 (1998)	Feb. 1998	SAE SP-1331
1466	Innovations in Design: 1993 Ford Hybrid Electric Vehicle Challenge	Feb. 1994	
1467	1996 & 1997 Future Car Challenge	Feb. 1997 & Feb. 1998	
1468	Introduction to Automotive Powertrain (Davis)		Davis Textbook
1469	US Application 60-100095	Filed Sept. 11, 1998	'095 Provisional
1470	History of Hybrid Electric Vehicle (Wakefield-1998)	1998	Wakefield
1471	SAE 920447 (Burke-1992)	Feb. 1, 1992	Burke 1992

Exhibit No.	Description	Date	Identifier
1472	Vehicle Tester for HEV (Duoba-1997)	Aug. 1, 1997	Duoba 1997
1473	DOE Report to Congress (1994)	April 1995	1994 Report to Congress
1474	SAE SP-1156 (1996)	Feb. 1996	SAE SP-1156
1475	DOE HEV Assessment (1979)	Sept. 30, 1979	HEV Assessment 1979
1476	EPA HEV Final Study (1971)	June 1, 1971	EPA HEV Final Study
1477	WO 9323263A1 (Field)	Nov. 25, 1998	9323263
1478	Toyota Prius (Yamaguchi-1998)	Jan. 1998	Toyota Prius Yamaguchi 1998
1479	US Patent 6,209,672	April 3, 2001	'672 Patent
1480	Propulsion System for Design for EV (Ehsani-1996)	1996	IEEE Eshani 1996
1481	Propulsion System Design for HEV (Ehsani-1997)	Feb. 1997	IEEE Eshani 1997
1482	Bosch Automotive Handbook (1996)	Oct. 1996	Bosch Handbook
1483	SAE SP-1089 (Anderson-1995)	Feb. 1995	SAE SP-1089
1484	Critical Issues in Quantifying HEV Emissions (An 1998)	Aug. 11, 1998	An 1998
1485	1973 Development of the Federal Urban Driving Schedule (SAE 730553)	May 14-18, 1973	
1486	Gregory Davis Resume		
1487	Gregory Davis Data		
1488	US Patent 4,407,132	Oct. 4, 1983	Kawakatsu
1489	US Patent 6,116,363	Sept. 12, 2000	Frank
1490	US Patent 5,823,280	Oct. 20, 1998	Lateur
1491	Automotive Electronics Handbook (Jurgen)	1995	Jurgen
1492	Bumby, J.R. et al. "Optimisation and control of a hybrid electric car" - IEE Proc. A 1987, 134(6)	Nov. 1987	Bumby II
1493	US Patent 5,343,970	Sept. 6, 1994	Severinsky '970
1494	Paice Complaint	Feb. 25, 2014	

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