

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. 7,104,347
IPR Case No.: IPR2015-00795
IPR Case No.: IPR2015-00794

U.S. Patent No. 7,237,634
IPR Case No.: IPR2015-00787
IPR Case No.: IPR2015-00722
IPR Case No.: IPR2015-00784
IPR Case No.: IPR2015-00791
IPR Case No.: IPR2015-00790

**NOTICE OF FILING FORD MOTOR COMPANY'S
DEMONSTRATIVE EXHIBITS
(GROUP 1)**

Attached please find Ford's demonstrative exhibits to be used at the trial hearing on June 28, 2016 at 9:00 AM in regard to Case Nos. IPR2015-00795, -00794, -00787, -00722, -00784, -00791, and -00790 (Group 1).

Dated: June 24, 2016

Respectfully submitted,

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Certificate of Service

The undersigned hereby certifies that on June 24, 2016, a complete and entire copy of **NOTICE OF FILING FORD MOTOR COMPANY'S DEMONSTRATIVE EXHIBITS (GROUP 1)**, was served via electronic mail by serving the correspondence email address of record as follows:

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FORD DEMONSTRATIVES

FORD MOTOR COMPANY, PETITIONER

v.

PAICE LLC & ABELL FOUNDATION, PATENT OWNERS

Group 1 (Ibaraki '882): IPR2015-00722, -784, -787, -790, -791, -794, -795

Group 2 (PCT): IPR2015-00606 and IPR2015-00799

Group 3 (Severinsky / Bumby): IPR2015-00758, -785, -792, -800, -801

**Before Sally C. Medley, Kalyan K. Deshpande,
Carl M. DeFranco, and Jameson Lee
Administrative Patent Judges**

Overview of Ibaraki '882 Issues

| # | Issue | '634 Patent | | | | | IPR-00791 | IPR-00791 |
|-----|--|-------------|-----------|-----------|-----------|-----------|-----------|-----------|
| | | IPR-00722 | IPR-00784 | IPR-00787 | IPR-00790 | IPR-00791 | | |
| CC | Claim construction - "setpoint" | CC | CC | CC | CC | CC | CC | CC |
| CC | Claim Construction – Paice’s “comparison” argument | CC | CC | CC | CC | CC | CC | CC |
| 1 | Compare road load to setpoint | Ground 1 | Ground 1 | Ground 1 | Ground 1 | Ground 1 | Ground 1 | Ground 1 |
| 2 | Setpoint is substantially less than MTO | Ground 1 | Ground 1 | Ground 1 | Ground 1 | Ground 1 | Ground 1 | Ground 1 |
| 3 | RL . . . Is more than the MTO | Ground 1 | Ground 1 | Ground 1 | | | Ground 1 | Ground 1 |
| 4 | Obviousness based on teachings of Ibaraki '882 | | | | Ground 2 | | | Ground 2 |
| 5 | Reason to combine Ibaraki '882 and Ibaraki '626 | Ground 2 | | | Ground 5 | | | Ground 5 |
| 6* | (a) Ibaraki '882 and Vittone disclose claimed limitation (b) Reason to combine Ibaraki '882 and Vittone | | | Ground 2 | Ground 4 | | | Ground 4 |
| 7 | Reason to combine Ibaraki '882 and Kawakatsu | | | | Ground 3 | | | Ground 3 |
| 8 | Reason to combine Ibaraki '882 and Suga | Ground 3 | | | Ground 6 | Ground 3 | | Ground 6 |
| 9* | Reason to combine Ibaraki '882 and Yamaguchi | | | Ground 3 | Ground 1 | | | Ground 3 |
| 10* | Reason to combine Ibaraki '882 and Frank | | Ground 2 | | | | Ground 2 | Ground 2 |

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