

Filed on behalf of: Ford Motor Company

Entered: December 16, 2016

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

IPR Case No.: IPR2015-00791

Before SALLY C. MEDLEY, KALYAN K. DESHPANDE, and CARL M.
DeFRANCO, *Administrative Patent Judges.*

PETITIONER'S NOTICE OF CROSS-APPEAL

Notice is hereby given, pursuant to 37 C.F.R. § 90.2(a), that Petitioner, Ford Motor Company (“Petitioner”), hereby appeals to the United States Court of Appeals for the Federal Circuit from the Final Written Decision entered on October 21, 2016 (Paper 36, attached hereto) and from all underlying orders, decisions, rulings and opinions that are adverse to Petitioner, including, without limitation, those within the Decision on Institution of *Inter Partes* Review, entered October 27, 2015 (Paper 12).

This notice is timely under C.F.R. § 90.3(a)(1) and Rule 4(a)(3) of the Federal Rules of Appellate Procedure because Patent Owners Paice LLC and the Abell Foundation, Inc. filed a notice of appeal on December 2, 2016. That appeal was assigned Case No. 17-1311.

In accordance with 37 C.F.R. § 90.2(a)(3)(ii), Petitioner further indicates that the issues on cross-appeal include, but are not limited to, the Board’s decision not to provide a final written decision on the merits, nor hold unpatentable, claims 80, 93, 99, 114, 127, 132, 139, and 215 of U.S. Patent No. 7,237,634.

Contemporaneously with this submission, a copy of the Notice of Cross-Appeal is being filed electronically with the Patent Trial and Appeal Board. In addition, a copy of this Notice of Appeal, along with the required docketing fees, are being electronically filed with the Clerk’s Office for the United States Court of Appeals for the Federal Circuit.

Dated: December 16, 2016

Respectfully submitted,

s /Frank A. Angileri/

Frank A. Angileri (Reg. No. 36,733)
John E. Nemazi (Reg. No. 30,876)
John P. Rondini (Reg. No. 64,949)
Michael N. MacCallum (Reg. No. 63,108)
BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075
(248) 358-4400

Attorneys for Petitioner

CERTIFICATE OF FILING AND SERVICE

The undersigned hereby certifies that on December 16, 2016, a complete and entire copy of **PETITIONER FORD MOTOR COMPANY'S NOTICE OF CROSS-APPEAL** was served by electronic mail to the following counsel of record:

LEAD COUNSEL	BACK-UP COUNSEL
Timothy W. Riffe, Reg. No. 43,881 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 Tel: (202) 783-5070 Email: IPR36351-0015IP9@fr.com; Riffe@fr.com	Kevin E. Greene, Reg. No. 46,031 Ruffin B. Cordell, Reg. No. 33,487 Linda L. Kordziel, Reg. No. 39,732 Daniel A. Tishman 3200 RBC Plaza 60 South Sixth Street Minneapolis, MN 55402 Tel: (202) 783-5070 Email: IPR36351-0015IP9@fr.com; Riffe@fr.com

I also certify that in addition to being filed electronically with the Board through its PRPS System, the original of the foregoing Petitioner Ford Motor Company's Notice of Cross-Appeal is being sent, pursuant to 37 C.F.R. § 104.2, via first-class mail on December 16, 2016 to the United States Patent and Trademark Office at the following address:

Office of the General Counsel
United States Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I further certify that a copy of the foregoing Petitioner's Notice of Cross-Appeal was filed via CM/ECF on December 16, 2016, with the United States Court of Appeals for the Federal Circuit.

Respectfully submitted,

s /Frank A. Angileri/

Frank A. Angileri (Reg. No. 36,733)

John E. Nemazi (Reg. No. 30,876)

John P. Rondini (Reg. No. 64,949)

Erin K. Bowles (Reg. No. 64,705)

Brooks Kushman P.C.

1000 Town Center, 22nd Floor

Southfield, MI 48075

(248) 358-4400

Attorneys for Petitioner

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.