

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner

v.

PAICE LLC & THE ABELL FOUNDATION
Patent Owner

Case IPR2015-00792
Patent 8,214,097

**DECLARATION OF NEIL HANNEMANN
IN SUPPORT OF THE PATENT OWNER'S RESPONSE**

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DECLARATION EXHIBITS

Exhibit Number	Exhibit Name
Ex. 2201	Table of Ford's IPR Petitions
Ex. 2202	Jeffery L. Stein, Deposition Tr. (IPR2014-00875) (Mar. 3, 2015)
Ex. 2203	Jeffery L. Stein, Deposition Tr. (IPR2014-00875) (May 29, 2015)
Ex. 2204	Jeffery L. Stein, Deposition Tr. (IPR2014-00570) (May 8, 2015)
Ex. 2205	Declaration of Daniel A. Tishman in Support of Patent Owners' Motion for Pro Hac Vice Admission
Ex. 2206	Declaration of Neil Hannemann
Ex. 2207	Neil Hannemann CV
Ex. 2208	Gregory W. Davis Deposition Tr. (IPR2014-00571 & IPR2014-00579) (Jan. 13, 2015)
Ex. 2209	Gregory W. Davis Deposition Tr. (IPR2014-01416) (June 3, 2015)
Ex. 2210	Gregory W. Davis Deposition Tr. (IPR2014-00571) (May 8, 2015)
Ex. 2211	Excerpts from Neil Hannemann Deposition Tr. (IPR2014-00571) (April 7, 2015)
Ex. 2212	Gregory W. Davis Deposition Tr. (IPR2014-00884) (Feb. 25, 2015)
Ex. 2213	Jeffery L. Stein, Deposition Tr. (IPR2014-01415) (May 29, 2015)
Ex. 2214	Jeffery L. Stein, Deposition Tr. (IPR2014-00570) (Jan. 12, 2015)
Ex. 2215	Integrated Microprocessor Control of a Hybrid i.c. Engine/Battery-Electric Automotive Power Train," P.W. Masding, J.R. Bumby, Jan. 1990
Ex. 2216	Masding, Philip Wilson (1988) "Some drive train control problems in hybrid i.c engine/battery electric vehicles," Durham theses, Durham University
Ex. 2217	Excerpt from McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Ed., 2003.

...

I, Neil Hannemann, hereby declare the following:

I. INTRODUCTION

1. I have been retained by counsel for Paice LLC and the Abell Foundation (collectively, “Paice” or “Patent Owner”) to investigate and analyze certain issues relating to the validity of claims of U.S. Patent No. 8,214,097 (“the ’097 patent”).

2. Specifically, for purposes of this declaration, I have been asked to analyze the arguments made by Ford Motor Company (“Ford” or “Petitioner”) in the matter of the *Inter Partes* Review of the ’097 patent, Case No. IPR2015-00792. I have reviewed Ford’s petition, along with the declaration of Ford’s expert, Dr. Stein, and the documents cited therein. I have reviewed the Patent Trial and Appeal Board’s (“the Board”) decision to institute, as well as the Board’s claim constructions. My analysis is based on the Board’s claim constructions, unless I specifically note otherwise.

3. I understand that the Board has instituted review of the following claims of the ’097 patent (the “challenged claims”): 1, 3, 4, 7, 9, 11, 13, 14, 17, 19, 21, 23, 24, 27, 28, 30, 32, 33, 37 and 38.

4. I understand that Ford and Dr. Stein argue that the challenged claims are obvious over U.S. Patent No. 5,343,970 (“Severinsky”) in combination with one or more of *A High-Expansion Ratio Gasoline Engine for the Toyota Hybrid System*,

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