

FORD MOTOR COMPANY v. PAICE, LLC, ET AL.

NEIL HANNEMANN

April 7, 2015

Prepared for you by



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1 UNITED STATES PATENT AND TRADEMARK OFFICE
2 BEFORE THE PATENT TRIAL AND APPEAL BOARD

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5 FORD MOTOR COMPANY, :
6 Petitioner, :
7 v. : IPR Case No:
8 PAICE LLC & ABELL FOUNDATION, : IPR2014-00571
9 INC., :
10 Patent Owner. :
11 :

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15 Oral Deposition of NEIL HANNEMANN
16 Washington, DC
17 Tuesday, April 7, 2015
18 9:58 a.m.

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22
23 Job No.: 79874
24 Pages: 1 - 145
25 Reported By: Rebecca Stonestreet, RPR, CRR

1 other commands?

2 A That's correct.

3 Q It says: "Acceleration, direction,
4 deceleration." Right?

5 A Yes.

6 Q And then it's got those five data input --
7 data inputs, rather, that are going into the
8 microprocessor controller in that cover page figure.
9 Right?

10 A That's correct.

11 Q So do you agree, then, that in this '970
12 patent, the microprocessor is going to determine how much
13 torque the motor provides, or the engine provides at any
14 given time?

15 MR. LIVEDALEN: Objection. Vague.

16 A Well, this describes that it performs that
17 function, but it doesn't describe how it's doing it.

18 Q Do you agree that when the microprocessor in
19 the '970 patent is determining how much torque the motor
20 and/or the engine should be generating, it's doing so
21 based on what the microprocessor concludes is required at
22 that point in time?

23 MR. LIVEDALEN: Objection. Vague, calls for
24 speculation.

25 A Well, yeah, the microprocessor -- basically,

1 you're asking if the microprocessor would perform as it's
2 intended to, as it's programmed to. And yeah, however
3 it's programmed is what it will do.

4 Q So however it's programmed, to determine the
5 amount of torque required from the motor and/or the
6 engine, that's how it's going to make that determination
7 when it's driving down the road. Correct?

8 MR. LIVEDALEN: Same objection.

9 A Right. There's many ways that it could do
10 that, and what's missing in the '970 patent is any
11 reference of using the road load to make that
12 determination.

13 Q In the '970 patent, when a microprocessor
14 determines how much torque is required from the motor end
15 or the engine, do you agree it does it instantaneously,
16 or in real time?

17 MR. LIVEDALEN: Objection. Vague, foundation.

18 A You know, I don't recall if I ever read in
19 here if they disclosed it was real time or not. So I
20 guess I just don't know that.

21 Q Would a person of skill in the art know that
22 when a microprocessor is determining how much torque is
23 required, they generally do it based on instantaneous
24 conditions?

25 MR. LIVEDALEN: Objection. Vague, foundation,