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VIA EMAIL

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Re: Paice LLC v. Ford Motor Company, Case No. 14-cv-00492-WDQ

I write to renew Ford's request that Paice limit the number of claims it presently asserts against Ford to a reasonable number. Before this suit, Paice notified Ford that it would assert 5 patents and over 250 patent claims against Ford. In response, Ford provided invalidity and noninfringement defenses to each of these claims. In addition, Paice already has a significant amount of information about these claims from its litigations with Toyota and Hyundai. As a result, Ford asked Paice to limit the claims at issue in this case to make this litigation more efficient, but you declined to do so.

Now, Paice is complaining to the Court about the number of IPRs Ford has filed. As you know, Ford must file a large number of IPRs to address over 250 claims. Ford, however, would be happy to reduce the number of IPRs if Paice agrees to limit the number of asserted claims. Please reconsider whether Paice will limit the number of asserted claims and, in exchange, Ford will agree to reduce the number of IPRs.

For example, Ford renews its request that Paice limit the number of claims presently asserted to 32 (no more than 10 per patent), and further reduce the number of asserted claims to 16 (from the initial set of 32 claims and no more than 5 per patent) after it receives Ford's invalidity contentions and document discovery.

Thank you for your consideration of this proposal. We look forward to your response.

Best regards,



Ann Marie Wahls