Case IPR2014-00571 Attorney Docket No: 36351-0011IP1

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 IPR2014-00571 Patent 7,104,347

PATENT OWNER'S RESPONSE TO PETITION

DOCKET

TABLE OF CONTENTS

INTRODUCTION	
I. CLAIM CONSTRUCTION	
A. The District Courts' Construction	
B. The Board should revise its construction of "setpoint (SP)"	6
II. DEFECTS IN THE INSTITUTED GROUNDS OF UNPATENTABILITY	
A. Ground 1 is Defective Because Ford Misapplies Severinsky to the Challenged Claims	
 B. Ground 1 is Defective Because Ford Has Failed to Demonstrate that Severinsky Discloses or Renders Obvious the Features Recited in Claim 23 	
 Severinsky does not disclose or render obvious "employing said engine to propel said vehicle when the torque RL required to do so is between said lower level SP and MTO" 	
 Severinsky does not disclose or render obvious "employing said at least one electric motor to propel said vehicle when the torque RL required to do so is less than said lower level SP" 	
 Severinsky does not disclose or render obvious "employing said engine to propel said vehicle when the torque RL required to do so is less than said lower level SP and using the torque between RL and SP to drive said at least one electric motor to charge said battery". 	
4. Severinsky does not disclose or render obvious a "setpoint"	
 C. Ground 2 is Defective Because Ford Has Failed to Demonstrate that Severinsky in view of Ehsani Render Obvious the challenged claims 	
 Severinsky in view of Ehsani does not render obvious "wherein said controller starts and operates said engine when torque require to be produced by said engine to propel the vehicle and/or to drive either one or both said electric motor(s) to charge said battery is at least equal to a setpoint (SP) above which said engine torque is efficiently produced" as required by claim 1 	

2.	Severinsky in view of Ehsani does not render obvious a "setpoint" as required by claim 1	. 55
3.	Severinsky in view of Ehsani does not render obvious "wherein said vehicle is operated in a plurality of operating modes responsive to the value for the road load (RL) and said setpoint SP" as required by claim 7	. 56
4.	Severinsky in view of Ehsani does not render obvious "a highway cruising mode IV, wherein said vehicle is propelled by torque provided by said internal combustion engine, while SP <rl<mto" 7<="" as="" by="" claim="" required="" td=""><td>. 57</td></rl<mto">	. 57
5.	Severinsky in view of Ehsani does not render obvious "a low-load mode I, wherein said vehicle is propelled by torque provided by said second electric motor in response to energy supplied from said battery, while RL <sp" 7<="" as="" by="" claim="" required="" td=""><td>. 58</td></sp">	. 58
6.	Severinsky in view of Ehsani does not render obvious claim 9	58
	Fround 3 is Defective Because Ford Has Failed o Demonstrate that Severinsky in View of Ehsani	
	Fails to Render Obvious the Challenged Claims	59
. CO	NCLUSION	. 60

III.

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EXHIBITS

Patent Owner	Exhibit Description
Exhibit	
Number	
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2002	
PAICE Ex.	Dr. Gregory W. Davis Deposition Transcript (Jan. 13, 2015)
2003	
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