

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL Board

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FORD MOTOR COMPANY,

Petitioner,

-vs-

PAICE, LLC & ABELL FOUNDATION, INC.,

Patent Owner.

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U.S. Patent No. 7,237,634

IPR Case Nos: IPR2015-00785

IPR2015-00801 IPR2015-00792,

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Deposition of JEFFREY STEIN, PhD

Tuesday, May 17, 2016

Southfield, Michigan

3:45 p.m.

Reported by:

Laura J. Steenbergh, CSR-3707, RPR, CRR, RMR

Job no: 16344

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APPEARANCES:

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TABLE OF CONTENTS

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12  
13  
14  
15  
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24  
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Witness

Page

JEFFREY STEIN, PhD

EXAMINATION BY MR. LIVEDALEN:

4

INDEX TO EXHIBITS

(Exhibits attached to transcript)

Exhibit

Page

STEIN EXHIBIT 1 Declaration of Jeffrey Stein

4

STEIN EXHIBIT 2 U.S. Patent Number 5,623,104

11

1 Southfield, Michigan  
2 Tuesday, May 17, 2016  
3 About 3:45 p.m. 03:45:23PM  
4 MR. LIVEDALEN: All right. Good afternoon, 03:45:23PM  
5 Dr. Stein. 03:45:31PM  
6 JEFFREY STEIN, PhD, 03:45:31PM  
7 having first been duly sworn, was examined and testified 03:45:31PM  
8 on his oath as follows: 03:45:31PM  
9 EXAMINATION BY MR. LIVEDALEN: 03:45:31PM  
10 Q. Do you mind repeating your full name for the record? 03:45:31PM  
11 A. My name is Jeffrey L. Stein. 03:45:36PM  
12 MR. LIVEDALEN: All right. And this 03:45:40PM  
13 transcript is going to be for IPR matters 2015-00785 03:45:43PM  
14 2015-00801 2015-00792. 03:45:51PM  
15 If the court reporter could hand Dr. Stein -- 03:45:58PM  
16 I guess we'll mark as Exhibit 1 Ford 1889. 03:46:05PM  
17 STEIN EXHIBIT 1 03:46:05PM  
18 Declaration of Jeffrey Stein 03:46:05PM  
19 WAS MARKED BY THE REPORTER 03:46:05PM  
20 FOR IDENTIFICATION 03:46:37PM  
21 BY MR. LIVEDALEN: 03:46:37PM  
22 Q. Dr. Stein, when you're ready can you please identify 03:46:44PM  
23 Exhibit 1? 03:46:47PM  
24 A. Deposition Exhibit 1 is the declaration of Dr. Stein in 03:46:47PM  
25 support of petitioner's reply to patent owner's response 03:46:55PM

1 for IPR2014-00801. 03:47:00PM

2 Q. Thanks. 03:47:05PM

3 MR. LIVEDALEN: And for the record I think it 03:47:09PM

4 should be IPR 2015 instead of 2014. That's fine. 03:47:10PM

5 MR. TURNER: Yes, you're correct. 03:47:20PM

6 BY MR. LIVEDALEN: 03:47:21PM

7 Q. All right. Dr. Stein, are you familiar with the term 03:47:24PM

8 road load as used in the '634 patent? 03:47:31PM

9 A. It's discussed in my declaration and I believe I discuss 03:47:37PM

10 it also in my reply declaration, which is in front of 03:47:48PM

11 me. 03:47:54PM

12 Q. Yeah. So are you aware the Board construed the term 03:47:54PM

13 road load as the amount of instantaneous torque required 03:48:01PM

14 to propel the vehicle, be it positive or negative? 03:48:05PM

15 A. Well, without looking at it, to know if those words are 03:48:09PM

16 exactly correct, it sounds relatively correct. 03:48:18PM

17 Q. Well, if you want to confirm, can you turn to page 32 of 03:48:20PM

18 your declaration, paragraph 47. 03:48:24PM

19 A. Road load is the amount of instantaneous torque required 03:48:34PM

20 to propel the vehicle, be it positive or negative. 03:48:38PM

21 Yes, that's the Board's construction of that 03:48:41PM

22 term. 03:48:49PM

23 Q. And would you agree with me that the instantaneous 03:48:54PM

24 torque required to propel the vehicle included the 03:48:56PM

25 torque to overcome both vehicle drag and rolling 03:48:59PM

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