

STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC.
Patent Owner.

U.S. Patent No. 8,214,097

IPR Case No.: IPR2015-00792

**PETITIONER'S RESPONSE TO PATENT OWNER'S
MOTION FOR OBSERVATIONS ON CROSS EXAMINATION**

Updated List of Exhibits

Exhibit No.	Description	Identifier
1201	U.S. Patent No. 8,214,097	'097 Patent
1202	Declaration of Dr. Jeffrey L. Stein	Stein Decl.
1203	<i>Paice LLC v. Ford Motor Company</i> , Case No. 1:14-cv-00492, District of MD, Baltimore Div., Complaint (Feb. 19, 2014)	Paice Complaint
1204	Ford's letter to Paice dated September 22, 2014	Ford Letter
1205	U.S. Patent No. 5,343,970	Severinsky '970
1206	Toshifumi Takaoka et al., <i>A High-Expansion Ratio Gasoline Engine for the Toyota Hybrid System</i> , Toyota Technical Review Vol. 47, No. 2 (April 1998) (available at: https://www.worldcat.org/title/a-high-expansion-ratio-gasoline-engine-for-the-toyota-hybrid-system/oclc/205516653&referer=brief_results .)	Takaoka
1207	<i>Ford Motor co. v. Paice LLC</i> , Case IPR2014-01415, Paper 9, Patent Owner Preliminary Response (P.T.A.B. Dec. 16, 2014)	IPR2014-01415 PO Preliminary Response
1208	Declaration of Walt Johnson, Librarian at Patent and Trademark Resource Center (PTRC), Minneapolis Central Library	Librarian Decl.
1209	U.S. Patent No. 5,865,263	Yamaguchi
1210	File History of U.S. Patent No. 8,214,097	'097 File History
1211	U.S. Patent No. 7,104,347	'347 Patent
1212	File History of U.S. Patent No. 7,104,347	'347 File History
1213	<i>Paice LLC v. Toyota Motor Corp. et al.</i> , Case No. 2:04-cv-211, E.D. Texas, Claim Construction Order (Dec. 5, 2008)	Toyota Litigation
1214	<i>Paice, LLC v. Hyundai Motor Corp. et a.</i> , Case No. 2:12-cv-0499, District of MD, Baltimore Div., Claim Construction Order (July 24, 2014)	Hyundai Litigation

Exhibit No.	Description	Identifier
1215	<i>Ford Motor Co. v. Paice, LLC</i> , Case IPR2014-00571, Paper 12, Decision (P.T.A.B. Sept. 30, 2014)	IPR2014-00571 Decision
1216	U.S. Patent No. 7,237,634	'634 Patent
1217	<i>Ford Motor Co. v. Paice, LLC</i> , Case IPR2014-00571, Paper 20, Patent Owner Response (P.T.A.B. Jan. 21, 2015)	IPR2014-0571 PO Response
1218	U.S. Patent No. 4,335,429	Kawakatsu
1219	Catherine Anderson & Erin Pettit, <i>The Effects of APU Characteristics on the Design of Hybrid Control Strategies for Hybrid Electric Vehicles</i> , SAE Technical Paper 950493 (February, 1995) (available at http://papers.sae.org/950493/.)	Anderson
1220	Curriculum Vitae of Dr. Jeffery L. Stein	Dr. Stein CV
1221	John B. Heywood, <i>Internal Combustion Engine Fundamentals</i> (McGraw-Hill 1988) (available at http://catalog.loc.gov/vwebv/holdingsInfo?searchId=20946&recCount=25&recPointer=4&bibId=2421798.)	Heywood
1222	Willard W. Pulkrabek, <i>Engineering Fundamentals of the Internal Combustion Engine</i> (Prentice Hall, 1997) (available at http://catalog.loc.gov/vwebv/holdingsInfo?searchId=10003&recCount=25&recPointer=1&bibId=2109503.)	Pulkrabek
1223	Hawley, G.G., <i>The Condensed Chemical Dictionary</i> , Van Nostrand Reinhold Co., 9 th ed. (1977) (available at http://catalog.loc.gov/vwebv/holdingsInfo?searchId=21541&recCount=25&recPointer=14&bibId=1289584.)	Hawley
1224	U.S. Patent No. 913,846	Pieper
1225	Michael Duoba, Ctr. for Transp. Research, Argonne Nat'l Lab., <i>Challenges for the Vehicle Tester in Characterizing Hybrid Electric Vehicles</i> , 7th CRC on Road Vehicle Emissions Workshop (April 1997) (available at http://www.osti.gov/scitech/biblio/516019.)	Duoba

Exhibit No.	Description	Identifier
1226	Society of Automotive Engineers Special Publication, <i>Technology for Electric and Hybrid Vehicles</i> , SAE SP-1331 (February 1998) (available at http://www.worldcat.org/title/technology-for-electric-and-hybrid-vehicles/oclc/39802642 .)	SAE SP-1331
1227	Kozo Yamaguchi et al., <i>Development of a New Hybrid System — Dual System</i> , SAE Technical Paper 960231 (February 1996) (available at http://papers.sae.org/960231/ .)	Yamaguchi Paper
1228	U.S. Patent No. 3,888,325	Reinbeck
1229	L. E. Unnewehr et al., <i>Hybrid Vehicle for Fuel Economy</i> , SAE Technical Paper 760121 (1976) (available at http://papers.sae.org/760121/ .)	Unnewehr
1230	Brown, T.L. et al., <i>Chemistry, The Central Science</i> , Third Edition (Prentice-Hall 1985) (available at http://catalog.loc.gov/vwebv/holdingsInfo?searchId=21829&recCount=25&recPointer=13&bibId=4259071 .)	Brown
1231	Grunde T. Engh & Stephen Wallman, <i>Development of the Volvo Lambda-Sond System</i> , SAE Technical Paper 770295 (1977) (available at http://papers.sae.org/770295/ .)	Engh
1232	A. G. Stefanopoulou et al., <i>Engine Air-Fuel Ratio and Torque Control using Secondary Throttles</i> , Proceedings of the 33rd IEEE Conference on Decision and Control (December 1994) (available at http://ieeexplore.ieee.org/xpl/articleDetails.jsp?tp=&arnumber=411385&queryText%3DA.+G.+Stefanopoulou+et+al.%2C+Engine+Air-Fuel+Ratio+and+Torque+Control+using+Secondary+Throttles%2C+Proceedings+of+the+33rd+IEEE+Conference+on+Decision+and+Control+.LB.December+1994.RB.)	Stefanopoulou

Exhibit No.	Description	Identifier
1233	Oreste Vittone et al., FIAT Research Centre, <i>Fiat Conceptual Approach to Hybrid Car Design</i> , 12th International Electric Vehicle Symposium, Volume 2 (1994), (available at https://www.worldcat.org/title/symposium-proceedings-12th-international-electric-vehicle-symposium-december-5-7-1994-disneyland-hotel-and-convention-center-anaheim-california/oclc/32209857&referer=brief_results .)	Vittone
1234	General Electric Company, Corp. Research & Dev., <i>Near-Term Hybrid Vehicle Program, Final Report - Phase I</i> (October 1979) (available at http://ntrs.nasa.gov/search.jsp?R=19800017707 .)	GE Final Report
1235	U.S. Application No. 13/065,704	'704 Application
1236	U.S. Patent No. 5,479,898	Cullen
1237	Reply Decl. of Dr. Jeffrey L. Stein	Reply Decl.
1238	Final Decision, IPR2015-01415, Paper 30 (March 10, 2016)	'1415 Final Decision
1239	Final Decision, IPR2014-01416, Paper 26 (March 10, 2016)	'1416 Final Decision
1240	Mr. Hannemann Deposition Transcript (IPR2015-00571, April 7, 2015)	Hn Tr. 1
1241	Final Decision, IPR2014-00570, Paper 44 (September 28, 2015)	'570 Final Decision
1242	Final Decision, IPR2014-00904, Paper 41 (December 10, 2015)	'904 Final Decision
1243	Mr. Hannemann Deposition Transcript (IPR2015-01415, September 4, 2015)	Hn Tr. 2
1244	Mr. Hannemann Deposition Transcript (IPR2015-00570, April 8, 2015)	Hn Tr. 3
1245	Dr. Stein Deposition Transcript (IPR2015-01415, May 29, 2015)	Stein Tr. 1
1246	Bosch Automotive Handbook (Oct. 1996)	Bosch Handbook

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