

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 IPR2015-00794
Patent 7,104,347

**DECLARATION OF NEIL HANNEMANN
IN SUPPORT OF THE PATENT OWNER'S RESPONSE**

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DECLARATION EXHIBITS

Exhibit Number	Exhibit Name
Ex. 2401	Table of Ford's IPR Petitions
Ex. 2402	Gregory Davis Deposition Transcript (Feb. 25, 2015)
Ex. 2403	The Oxford Essential Dictionary, American Ed. (1998) (excerpt)
Ex. 2404	Appendix A (Jan. 15, 2014)
Ex. 2405	Declaration of Daniel A. Tishman in Support of Patent Owners' Motion for Pro Hac Vice Admission
Ex. 2406	Declaration of Neil Hannemann
Ex. 2407	Neil Hannemann CV
Ex. 2408	Gregory W. Davis, Deposition Tr. (IPR2015-00722, IPR2015-00784, IPR2015-00787, IPR2015-00790, IPR2015-00791, IPR2015-00794, IPR2015-00795) (January 13, 2016)
Ex. 2409	Hybrid Power Unit Development for Fiat Multipla Vehicle," by A. Caraceni, G. Cipolla, and R. Barbiero, SAE Publication 981124 (1998) ("Caraceni")
Ex. 2410	Ehsani et al., Modern Electric Hybrid Electric, and Fuel Cell Vehicles (2005)
Ex. 2411	Gregory W. Davis, Deposition Tr. (IPR2014-00571, IPR2014-00579) (January 13, 2015)
Ex. 2412	Jeffery L. Stein, Deposition Tr. (IPR2014-00875) (Mar. 3, 2015)
Ex. 2413	Ex. 1661 from IPR2015-00790
Ex. 2414	Gregory W. Davis, Deposition Tr. (IPR2014-01416) (June 3, 2015)

...

I, Neil Hannemann, hereby declare the following:

I. INTRODUCTION

1. I have been retained by counsel for Paice LLC and the Abell Foundation (collectively, “Paice” or “Patent Owner”) to investigate and analyze certain issues relating to the validity of claims of U.S. Patent No. 7,104,347 (“the ’347 patent”).

2. Specifically, for purposes of this declaration, I have been asked to analyze the arguments made by Ford Motor Company (“Ford” or “Petitioner”) in the matter of the *Inter Partes* Review of the ’347 patent, Case No. IPR2015-00794. I have reviewed Ford’s petition, along with the declaration of Ford’s expert, Dr. Davis, and the documents cited therein. I have reviewed the Patent Trial and Appeal Board’s (“the Board”) decision to institute, as well as the Board’s claim constructions. My analysis is based on the Board’s claim constructions, unless I specifically note otherwise.

3. I understand that the Board has instituted review of the following claims of the ’347 patent (the “challenged claims”): 23, 25-30, 32, and 39-41. The Board did not institute review of claim 24.

4. I understand that Ford and Dr. Davis argue that the challenged claims are obvious over various combinations of U.S. Patent No. 5,789,882 to Ibaraki et al. (Ex. 1403) (“Ibaraki ’882”), either alone or in combination with U.S. Patent No.

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