UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC. Patent Owners.

U.S. Patent No. 7,104,347 to Severinsky *et al.* IPR Case No. <u>IPR2015-00794</u>

DECLARATION OF DR. GREGORY W. DAVIS IN SUPPORT OF PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE



FADD 1465

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Upda	Updated Exhibit List					
I.	Ibaraki '882 discloses a torque based line7					
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Updated Exhibit List

Exhibit			
No.	Description	Date	Identifier
1401	US Patent 7,104,347	Sept. 12, 2006	'347 Patent
1402	Ford Letter to Paice	Sept. 2014	Ford Letter
1403	US Patent 5,789,882	Aug. 4, 1998	Ibaraki '882
1404	US Patent 5,623,104	Apr. 22, 1997	Suga
1405	US Patent 4,335,429	June 15, 1982	Kawakatsu '429
1406	Automotive Electronics		Jurgen
1407	US Patent 5 823 280	Oct 20 1998	Lateur
1407	Declaration of Gregory Davis	000.20,1770	Davis Dec
1409	US Application 60-100095	Filed Sept. 11,	'095 Provisional
		1998	
1410	Excerpt of USPN 7,104,347 File History	n/a	'347 File History
1411	U.S. Patent No. 7,237,634	July 3, 2007	'634 Patent
1412	7,237,634 File History (certified)	n/a	'634 Patent File History
1413	Toyota Litigations	2005	Toyota Litigation
1414	Hyundai Litigation	2013-2014	Hyundai
			Litigation
1415	PTAB Decisions & Preliminary Response in 2014-00571		Ford IPRs
1416	Bosch Automotive Handbook	Oct. 1996	Bosch Handbook
1417	US Patent 5 934 395	Δυσ 10 1999	Koide
1418	US Patent 6 116 363	Sept 12 2000	Frank
1419	Engineering Fundamentals of the	1997	Pulkrahek
1117	Internal Combustion Engine	1777	T UIRIUOUR
1420	Fiat Conceptual Approach to	Dec. 5-7, 1994	Vittone
	Hybrid Cars Design (Vittone)		
1421	US Patent 5,865,263	Feb. 2, 1999	Yamaguchi
1422	US Patent 6,003,626	Dec. 21, 1999	Ibaraki '626
1423	Innovations in Design: 1993	Feb. 1994	
	Ford Hybrid Electric Vehicle		
	Challenge		

Exhibit			
No.	Description	Date	Identifier
1424	1996 & 1997 Future Car	Feb. 1997 &	
	Challenge	Feb. 1998	
1425	Introduction to Automotive		Davis Textbook
	Powertrain (Davis)		
1426	History of Hybrid Electric	1998	Wakefield
	Vehicle (Wakefield-1998)		
1427	SAE 760121 (Unnewehr-1976)	Feb. 1, 1976	Unnewehr
1428	SAE 920447 (Burke-1992)	Feb. 1, 1992	Burke 1992
1429	Vehicle Tester for HEV (Duoba-	Aug. 1, 1997	Duoba 1997
	1997)		
1430	DOE Report to Congress (1994)	April 1995	1994 Report to
			Congress
1431	SAE SP-1331 (1998)	Feb. 1998	SAE SP-1331
1432	SAE SP-1156 (1996)	Feb. 1996	SAE SP-1156
1433	Microprocessor Design for HEV	Sept. 1, 1988	Bumby/Masding
	(Bumby-1988)		1988
1434	DOE HEV Assessment (1979)	Sept. 30, 1979	HEV Assessment
			1979
1435	EPA HEV Final Study (1971)	June 1, 1971	EPA HEV Final
			Study
1436	Propulsion System for Design	June 18, 2005	IEEE Ehsani 1996
	for EV (Ehsani-1996)		
1437	Propulsion System Design for	Feb. 1997	IEEE Ehsani 1997
	HEV (Ehsani-1997)		
1438	Critical Issues in Quantifying	Aug. 11, 1998	An 1998
	HEV Emissions (An 1998)		
1439	WO 9323263A1 (Field)	Nov. 25, 1998	9323263
1440	Toyota Prius (Yamaguchi-1998)	Jan. 1998	Toyota Prius
			Yamaguchi 1998
1441	US Patent 6,209,672	April 3, 2001	'672 Patent
1442	SAE SP-1089 (Anderson-1995)	Feb. 1995	SAE SP-1089
1443	1973 Development of the	1973	SAE 1973
	Federal Urban Driving Schedule		
	(SAE 730553)		
1444	Gregory Davis Resume		
1445	Gregory Davis Data		
1446	U.S. Patent No. 4,407,132	Oct. 4, 1983	Kawakatsu '132

Exhibit			
No.	Description	Date	Identifier
1447	Final Decision, IPR2014-00904,	December 10,	'904 Decision
	Paper 41	2015	
1448	Final Decision, IPR2014-00571,	September 28,	'571 Decision
	Paper 44	2015	
1449	Final Decision, IPR2014-01416,	March 10, 2016	'1416 Decision
	Paper 26		
1450	Deposition Transcript of Neil	Sept. 4, 2015	Hannemann '1416
	Hannemann for IPR2014-01416		Dep.
1451	Final Decision, IPR2014-00884,	December 10,	'884 Decision
	Paper 38	2015	
1452	Final Decision, IPR2014-00875,	November 23,	'875 Decision
	Paper 38	2015	
1453	Final Decision, IPR2014-01415,	March 10, 2016	'1415 Decision
	Paper 30		
1454	Deposition Transcript of Neil	April 8, 2015	Hannemann '570
	Hannemann for IPR2014-00570		Dep.
1455	Deposition Transcript of Neil	April 30, 2015	Hannemann '875
	Hannemann for IPR2014-00875		Dep.
1456	Exhibit 2 from deposition of Neil	April 30, 2015	'875 Dep. Exhibit
	Hannemann for IPR2014-00875		
1457	Patent Owner's Response,	March 10, 2015	'884 POR
	IPR2014-00884, Paper 19		
1458	Modern Electric, Hybrid Electric	2005	Ehsani
	and Fuel Cell Vehicles		
1459	Bosch Handbook	1976	Bosch Handbook
			1976
1460	Deposition Transcript of Neil	April 30, 2015	Hannemann '884
	Hannemann for IPR2014-00884		Dep.
1461	Deposition Transcript of Neil	April 27, 2016	Hannemann '787
1 1 5 9	Hannemann for IPR2014-00787		Dep.
1462	Exhibit 12 from Deposition	April 30, 2015	'884 Dep. Exhibit
	Transcript of Neil Hannemann		
1.1.62	(IPR2014-00884)	1 1 2 2015	
1463	Patent Owner's Response,	June 17, 2015	1416 POR
1 4 5 4	IPR2014-01416, Paper 17		
1464	Deposition Transcript of Neil	April 7, 2015	Hannemann '571
	Hannemann for IPR2014-00571		Dep.

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