UNITED 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. 7,104,347 to Severinsky et al.

IPR Case No.: IPR2015-00794

REPLY TO PATENT OWNER'S RESPONSE TO PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,104,347

Case No: IPR2015-00794 Attorney Docket No. FPGP0101IPR6

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IV.	Grounds 1-2: Ibaraki '882 renders the challenged claims unpatentable		
	A. B.	 Ibaraki '882 discloses operating the engine/motor when the "road load" is above/below a "setpoint"	3 9 11 12
V.		Ground 2: Claim 29 is obvious over Ibaraki '882 in view of the knowledge of a PHOSITA and known prior art systems	
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Updated List of Exhibits

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 Handbook (Jurgen)		Jurgen
1407	US Patent 5,823,280	Oct. 20, 1998	Lateur
1408	Declaration of Gregory Davis	,	Davis Dec.
1409	US Application 60-100095	Filed Sept. 11, 1998	'095 Provisional
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 (1996)	Oct. 1996	Bosch Handbook
1417	US Patent 5,934,395	Aug. 10, 1999	Koide
1418	US Patent 6,116,363	Sept. 12, 2000	Frank
1419	Engineering Fundamentals of the Internal Combustion Engine	1997	Pulkrabek
1420	Fiat Conceptual Approach to Hybrid Cars Design (Vittone)	Dec. 5-7, 1994	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 Ford Hybrid Electric Vehicle Challenge	Feb. 1994	



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-1997)	Aug. 1, 1997	Duoba 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 for EV (Ehsani-1996)	June 18, 2005	IEEE Ehsani 1996
1437	Propulsion System Design for HEV (Ehsani-1997)	Feb. 1997	IEEE Ehsani 1997
1438	Critical Issues in Quantifying HEV Emissions (An 1998)	Aug. 11, 1998	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



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