

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 IPR2015-00790
Patent 7,237,634

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

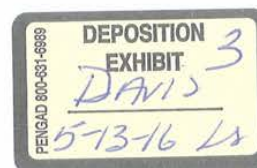


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DECLARATION EXHIBITS

Exhibit Number	Exhibit Name
Ex. 2601	Table of Ford's IPR Petitions
Ex. 2602	U.S. Patent No. 8,214,097 File History
Ex. 2603	Appendix A (Jan. 15, 2014)
Ex. 2604	Declaration of Daniel A. Tishman in Support of Patent Owners' Motion for Pro Hac Vice Admission
Ex. 2605	Declaration of Neil Hannemann
Ex. 2606	Neil Hannemann CV
Ex. 2607	Gregory W. Davis, Deposition Tr. (IPR2015-00722, IPR2015-00784, IPR2015-00787, IPR2015-00790, IPR2015-00791, IPR2015-00794, IPR2015-00795) (January 13, 2016)
Ex. 2608	Hybrid Power Unit Development for Fiat Multipla Vehicle," by A. Caraceni, G. Cipolla, and R. Barbiero, SAE Publication 981124 (1998) ("Caraceni")
Ex. 2609	Jeffery L. Stein, Deposition Tr. (IPR2014-00875) (Mar. 3, 2015)
Ex. 2610	Gregory W. Davis, Deposition Tr. (IPR2014-00571, IPR2014-00579) (January 13, 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. 7,237,634 (“the ’634 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 ’634 patent, Case No. IPR2015-00790. 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 ’634 patent (the “challenged claims”): 4, 13-15, 25, 28, 29, 32, 67, and 79.

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. 1652) (“Ibaraki ’882”), U.S. Patent No. 5,865,263 to Yamaguchi (Ex. 1653) (“Yamaguchi”), P.W. Masding et al., *A Microprocessor controlled Gearbox for use*

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