

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY  
Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC.  
Patent Owner.

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U.S. Patent No. 7,104,347  
IPR Case No.: IPR2015-00795  
IPR Case No.: IPR2015-00794

U.S. Patent No. 7,237,634  
IPR Case No.: IPR2015-00787  
IPR Case No.: IPR2015-00722  
IPR Case No.: IPR2015-00784  
IPR Case No.: IPR2015-00791  
IPR Case No.: IPR2015-00790

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**NOTICE OF FILING FORD MOTOR COMPANY'S  
DEMONSTRATIVE EXHIBITS  
(GROUP 1)**

Attached please find Ford's demonstrative exhibits to be used at the trial hearing on June 28, 2016 at 9:00 AM in regard to Case Nos. IPR2015-00795, -00794, -00787, -00722, -00784, -00791, and -00790 (Group 1).

Dated: June 24, 2016

Respectfully submitted,

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**Certificate of Service**

The undersigned hereby certifies that on June 24, 2016, a complete and entire copy of **NOTICE OF FILING FORD MOTOR COMPANY'S DEMONSTRATIVE EXHIBITS (GROUP 1)**, was served via electronic mail by serving the correspondence email address of record as follows:

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# FORD DEMONSTRATIVES

*FORD MOTOR COMPANY, PETITIONER*

*v.*

*PAICE LLC & ABELL FOUNDATION, PATENT OWNERS*

Group 1 (Ibaraki '882): IPR2015-00722, -784, -787, -790, -791, -794, -795

Group 2 (PCT): IPR2015-00606 and IPR2015-00799

Group 3 (Severinsky / Bumby): IPR2015-00758, -785, -792, -800, -801

**Before Sally C. Medley, Kalyan K. Deshpande,  
Carl M. DeFranco, and Jameson Lee  
Administrative Patent Judges**

**Overview of Ibaraki '882 Issues**

#	Issue	'634 Patent					IPR-00791	IPR-00791
		IPR-00722	IPR-00784	IPR-00787	IPR-00790	IPR-00791		
CC	Claim construction - "setpoint"	CC	CC	CC	CC	CC	CC	CC
CC	Claim Construction – Paice’s “comparison” argument	CC	CC	CC	CC	CC	CC	CC
1	Compare road load to setpoint	Ground 1	Ground 1	Ground 1	Ground 1	Ground 1	Ground 1	Ground 1
2	Setpoint is substantially less than MTO	Ground 1	Ground 1	Ground 1	Ground 1	Ground 1	Ground 1	Ground 1
3	RL . . . Is more than the MTO	Ground 1	Ground 1	Ground 1		Ground 1	Ground 1	Ground 1
4	Obviousness based on teachings of Ibaraki '882				Ground 2			Ground 2
5	Reason to combine Ibaraki '882 and Ibaraki '626	Ground 2			Ground 5			Ground 5
6*	(a) Ibaraki '882 and Vittone disclose claimed limitation (b) Reason to combine Ibaraki '882 and Vittone			Ground 2	Ground 4			Ground 4
7	Reason to combine Ibaraki '882 and Kawakatsu				Ground 3			Ground 3
8	Reason to combine Ibaraki '882 and Suga	Ground 3			Ground 6	Ground 3		Ground 6
9*	Reason to combine Ibaraki '882 and Yamaguchi			Ground 3	Ground 1			Ground 3
10*	Reason to combine Ibaraki '882 and Frank		Ground 2			Ground 2		Ground 2

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