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.: IPR2015-00795

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

Case No: IPR2015-00795 Attorney Docket No. FPGP0101IPR5

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		 Paice's power argument is not based on the figures nor disclosure of Ibaraki '882 Fig. 5 of Ibaraki '882 discloses mode selection based on 	5
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Case No: IPR2015-00795 Attorney Docket No. FPGP0101IPR5

Updated List of Exhibits

Exhibit			
No.	Description	Date	Identifier
1301	US Patent 7,104,347	Sept. 12, 2006	'347 Patent
1302	Ford Letter to Paice	Sept. 2014	
1303	US Patent 5,789,882	Aug. 4, 1998	Ibaraki '882
1304	US Patent 5,623,104	Apr. 22, 1997	Suga '104
1305	US Patent 4,335,429	Jun. 15, 1982	Kawakatsu '429
1306	Automotive Electronics Handbook (Jurgen)		Jurgen
1307	US Patent 5,823,280	Oct. 20, 1998	Lateur '280
1308	Declaration of Gregory Davis		Davis Dec.
1309	US Application 60-100095	Filed Sept. 11, 1998	'095 Provisional
1310	Excerpt of USPN 7,104,347 File History	n/a	'347 File History
1311	U.S. Patent No. 7,237,634	July 3, 2007	'634 Patent
1312	7,237,634 File History (certified)	n/a	'634 Patent File History
1313	Toyota Litigations	2005	Toyota Litigation
1314	Hyundai Litigation	2013-2014	Hyundai
			Litigation
1315	PTAB Decisions & Preliminary Response in 2014-00571		
1316	Bosch Automotive Handbook (1996)	Oct. 1996	Bosch Handbook
1317	US Patent 5,934,395	Aug. 10, 1999	Koide
1318	US Patent 6,116,363	Sept. 12, 2000	Frank
1319	Engineering Fundamentals of the Internal Combustion Engine	1997	Pulkrabek
1320	Fiat Conceptual Approach to Hybrid Cars Design (Vittone)	Dec. 5-7, 1994	Vittone
1321	US Patent 5,865,263	Feb. 2, 1999	Yamaguchi
1322	US Patent 6,003,626	Dec. 21, 1999	Ibaraki '626
1323	Innovations in Design: 1993 Ford Hybrid Electric Vehicle Challenge	Feb. 1994	



Exhibit			
No.	Description	Date	Identifier
1324	1996 & 1997 Future Car	Feb. 1997 &	
	Challenge	Feb. 1998	
1325	Introduction to Automotive		Davis Textbook
	Powertrain (Davis)		
1326	History of Hybrid Electric	1998	Wakefield
	Vehicle (Wakefield-1998)		
1327	SAE 760121 (Unnewehr-1976)	Feb. 1, 1976	Unnewehr
1328	SAE 920447 (Burke-1992)	Feb. 1, 1992	Burke 1992
1329	Vehicle Tester for HEV (Duoba-1997)	Aug. 1, 1997	Duoba 1997
1330	DOE Report to Congress (1994)	April 1995	1994 Report to
			Congress
1331	SAE SP-1331 (1998)	Feb. 1998	SAE SP-1331
1332	SAE SP-1156 (1996)	Feb. 1996	SAE SP-1156
1333	Microprocessor Design for HEV	Sept. 1, 1988	Bumby/Masding
	(Bumby-1988)		1988
1334	DOE HEV Assessment (1979)	Sept. 30, 1979	HEV Assessment 1979
1335	EPA HEV Final Study (1971)	June 1, 1971	EPA HEV Final
			Study
1336	Propulsion System for Design for EV (Ehsani-1996)	June 18, 2005	IEEE Ehsani 1996
1337	Propulsion System Design for HEV (Ehsani-1997)	Feb. 1997	IEEE Ehsani 1997
1338	Critical Issues in Quantifying HEV Emissions (An 1998)	Aug. 11, 1998	An 1998
1339	WO 9323263A1 (Field)	Nov. 25, 1998	9323263
1340	Toyota Prius (Yamaguchi-1998)	Jan. 1998	Toyota Prius
			Yamaguchi 1998
1341	US Patent 6,209,672	April 3, 2001	'672 Patent
1342	SAE SP-1089 (Anderson-1995)	Feb. 1995	SAE SP-1089
1343	1973 Development of the	1973	SAE 1973
	Federal Urban Driving Schedule (SAE 730553)		
1344	Gregory Davis Resume		
1345	Gregory Davis Data		
1346	US Patent 4,407,132	Oct. 4, 1983	Kawakatsu '132



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