UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
FORD MOTOR COMPANY Petitioner
V.
PAICE LLC & THE ABELL FOUNDATION, INC. Patent Owner
Case IPR2015-00799 Patent 7,237,634

PATENT OWNER'S RESPONSE



TABLE OF CONTENTS

I.	INT	RODUCTION1		
II.	THE '634 PATENT			
	A.	The '634 Patent's Applications		
	B.	Background of the '634 Patent		
	C.	The Challenged Claims		
III.	ARGUMENT			
	A.	The Effective Filing Date of the Challenged Claims Pre-Dates the '455 PCT Application		
		1. Severinsky '970 is Incorporated into Applications Pre-Dating the '455 PCT Application		
	B.	There is Support for the High Voltage Claims in Applications Pre- Dating the '455 PCT Application		
		1. The High Voltage Claims Are Supported in Severinsky '970 .16		
		1. The High Voltage Claims Are Supported in Applications Pre- Dating the '455 PCT Application		
	C.	There is Support for the Low Current Claims in Applications Pre- Dating the '455 PCT Application		
		1. The Low Current Claims Are Supported in Severinsky '97028		
		2. The Low Current Claims Are Supported in Applications Pre- Dating the '455 PCT Application		
	D.	There is Support for the 2.5 Ratio Claims in Applications Pre-Dating the '455 PCT Application		
IV.	CON	ICLUSION40		



TABLE OF AUTHORITIES

Page(s) Cases Apple, Inc. v. Samsung Elecs. Co., C.A. No. 12-cv-00630-LHK, 2014 WL 252045 (N.D. Cal. Jan. 21, Augustine Med., Inc. v. Gaymar Indus., Inc., Bilstad v. Wakalopulos, 386 F.3d 1116 (Fed. Cir. 2004) passim Callaway Golf Co. v. Acushnet Co., Harari v. Lee, Hollmer v. Harari. Ralston Purina Co. v. Far-Mar-Co. Inc... Union Oil Co. of California v. Atl. Richfield Co., Wang Labs., Inc. v. Toshiba Corp., 993 F.2d 858 (Fed. Cir. 1993)8 Zenon Envtl., Inc. v. U.S. Filter Corp., **Statutes** 35 U.S.C. § 311



Patent No. 7,237,634 Patent Owner's Response

Case IPR2015-00799 Attorney Docket No: 36351-0015IPB

Other Authorities

37 C.F.R. § 42.100	 1
37 C.F.R. § 42.120	 1



Case IPR2015-00799 Attorney Docket No: 36351-0015IPB

EXHIBITS

Exhibit Number	Exhibit Name
Ex. 2901	Table of Ford's IPR Petitions
Ex. 2902	Bosch Automotive Handbook, 1996 ed.
Ex. 2903	Declaration of Daniel A. Tishman in Support of
	Patent Owners' Motion for Pro Hac Vice Admission
Ex. 2904	Declaration of Neil Hannemann
Ex. 2905	Neil Hannemann CV
Ex. 2906	ZVEI, Voltage Classes for Electric Mobility
	(December 2013)
Ex. 2907	Gregory W. Davis Deposition Tr. (IPR2015-00758)
	(January 13, 2016)



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

