

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,

v.

PAICE LLC & ABELL FOUNDATION, INC.
Patent Owners.

Case IPR2015-00799
Patent 7,237,634

**PATENT OWNER'S MOTION FOR OBSERVATIONS ON THE
CROSS EXAMINATION OF DR. JEFFREY STEIN**

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)
Ex. 2908	Deposition Transcript of Jeffrey Stein, Ph.D.

1. In exhibit 2908, on page 31, line 24 to page 34, line 3, Dr. Stein testified that claim 7 of U.S. Patent No. 5,343,970 (“the ’970 patent”) discloses a battery providing a maximum current of 75 amperes to the electric motor, that the corresponding voltage would be a voltage under load, and that claim 8 (which depends from claim 7) states that the corresponding voltage is between 500 to 1,500 volts. This testimony is relevant to paragraphs 64-68 of Dr. Stein’s Reply Declaration (Ex. 1999). The testimony is relevant because it contradicts Dr. Stein’s reply declaration testimony that the ’970 patent does not disclose 500 to 1,500 volts under load.

2. In exhibit 2908, on page 46, line 7-21 and page 47 line 18 to page 48, line 3, Dr. Stein testified that both claim 7 (at column 23) and column 19 of the ’970 patent disclose providing a maximum current of 75 amperes and that both claim 8 (which depends from claim 7 and also found at column 23) and column 19 of the ’970 patent both disclose voltages of 500 to 1,500 volts. This testimony is relevant to paragraphs 64-68 of Dr. Stein’s Reply Declaration (Ex. 1999). The testimony is relevant because it calls into question Dr. Stein’s reply declaration testimony that the ’970 patent disclosure that “[t]ypical maximum voltages corresponding to light and heavy vehicles are between 500 and 1,500 volts” found on column 19 of the ’970 patent are not clearly voltages under load.

3. In exhibit 2908, on page 73, line 17-25, Dr. Stein testified that when the battery is providing power and there's a current flowing, the corresponding voltage is a voltage under load. This testimony is relevant to paragraphs 25-31 of Dr. Stein's Reply Declaration (Ex. 1999). The testimony is relevant because it calls into question Dr. Stein's reply declaration testimony that U.S. Application No. 09/392,743's disclosure that disclosed operating voltages in the sentence "the vehicle's electrical system operates at higher voltage than conventional electric and hybrid vehicles, e.g., 800 - 1200 V as compared to 240 V; this approximate three-fold increase in the operating voltage provides a concomitant reduction in the current that flows in the various modes of operation of the vehicle, to one-third the current that would flow for the same amount of power transfer in a low-voltage system" are not voltages under load.

4. In exhibit 2908, on page 70, line 15 to page 71, line 8, Dr. Stein testified that when a hybrid vehicle is being driven, the electrical system will provide current for movement of the vehicle. This testimony is relevant to paragraphs 25-31 of Dr. Stein's Reply Declaration (Ex. 1999). The testimony is relevant because it calls into question Dr. Stein's reply declaration testimony that U.S. Application No. 09/392,743's disclosure that disclosed operating voltages in the sentence "the vehicle's electrical system operates at higher voltage than conventional electric and hybrid vehicles, e.g., 800 - 1200 V as compared to 240

V; this approximate three-fold increase in the operating voltage provides a concomitant reduction in the current that flows in the various modes of operation of the vehicle, to one-third the current that would flow for the same amount of power transfer in a low-voltage system” are not voltages under load.

5. In exhibit 2908, on page 77, line 18 to page 78, line 2, Dr. Stein testified that when the nominal voltage is increased by threefold, the corresponding current remains zero. This testimony is relevant to paragraphs 25-31 of Dr. Stein’s Reply Declaration (Ex. 1999). The testimony is relevant because it calls into question Dr. Stein’s reply declaration testimony that U.S. Application No. 09/392,743’s disclosure that disclosed operating voltages in the sentence “the vehicle’s electrical system operates at higher voltage than conventional electric and hybrid vehicles, e.g., 800 - 1200 V as compared to 240 V; this approximate three-fold increase in the operating voltage provides a concomitant reduction in the current that flows in the various modes of operation of the vehicle, to one-third the current that would flow for the same amount of power transfer in a low-voltage system” are nominal voltages and not voltages under load.

6. In exhibit 2908, on page 90, line 23 to page 91, line 15, Dr. Stein testified that hybrid vehicle design considerations prevent the maximum voltage of the electrical system to reach infinity. This testimony is relevant to paragraphs 64-68 of Dr. Stein’s Reply Declaration (Ex. 1999). The testimony is relevant because

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.