

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 IPR2015-00801
Patent 7,237,634

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

EXHIBITS

Exhibit Number	Exhibit Name
Ex. 2801	U.S. Patent No. 8,214,097 File History
Ex. 2802	Table of Ford's IPR Petitions
Ex. 2803	Appendix A (January 15, 2014)
Ex. 2804	Jeffery L. Stein, Deposition Tr. (IPR2014-00570) (May 8, 2015)
Ex. 2805	Jeffery L. Stein, Deposition Tr. (IPR2014-00875) (Mar. 3, 2015)
Ex. 2806	Jeffery L. Stein, Deposition Tr. (IPR2014-00875) (May 29, 2015)
Ex. 2807	Declaration of Daniel A. Tishman in Support of Patent Owners' Motion for Pro Hac Vice Admission
Ex. 2808	Declaration of Neil Hannemann
Ex. 2809	Neil Hannemann CV
Ex. 2810	Gregory W. Davis Deposition Tr. (IPR2014-00571 & IPR2014-00579) (Jan. 13, 2015)
Ex. 2811	Gregory W. Davis Deposition Tr. (IPR2014-01416) (June 3, 2015)
Ex. 2812	Gregory W. Davis Deposition Tr. (IPR2014-00571) (May 8, 2015)
Ex. 2813	Excerpts from Neil Hannemann Deposition Tr. (IPR2014-00571) (April 7, 2015)
Ex. 2814	Jeffery L. Stein, Deposition Tr. (IPR2014-00570) (Jan. 12, 2015)
Ex. 2815	Jeffery L. Stein, Deposition Tr. (IPR2014-01415) (May 29, 2015)
Ex. 2816	Integrated Microprocessor Control of a Hybrid i.c. Engine/Battery-Electric Automotive Power Train," P.W. Masding, J.R. Bumby, Jan. 1990
Ex. 2817	Masding, Philip Wilson (1988) "Some drive train control problems in hybrid i.c engine/battery electric vehicles," Durham theses, Durham University
Ex. 2818	Excerpt from McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Ed., 2003.
Ex. 2819	Deposition Transcript of Jeffrey Stein, Ph.D.

1. In exhibit 2819, on page 6, line 11 to page 7, line 5, Dr. Stein testified that the torque required to propel the vehicle takes into account factors such as aerodynamic drag, wind, grade, and acceleration. This testimony is relevant to paragraphs 6-12 of Dr. Stein's Reply Declaration (Ex. 1889). The testimony is relevant because it calls into question Dr. Stein's reply declaration testimony that U.S. Patent No. 5,343,970 ("the '970 patent") uses road load.

2. In exhibit 2819, on page 12, line 5-16, Dr. Stein testified that U.S. Patent No. 5,623,104 ("Suga") is about a particular way of testing the performance of an electric motor in an electric vehicle. This testimony is relevant to paragraphs 39-45 of Dr. Stein's Reply Declaration (Ex. 1889). The testimony is relevant because it calls into question Dr. Stein's reply declaration testimony that a person of ordinary skill in the art would look to Suga in order to size a motor in a hybrid vehicle that is sufficiently powerful to provide acceleration to conform to the Federal Urban Cycle Driving Fuel Mileage Test.

Dated: May 20, 2016

By: /Brian J. Livedalen
Timothy W. Riffe (Reg. No. 43,881)
Kevin Greene, (Reg. No. 46,031)
Brian J. Livedalen (Reg. No. 67,450)
FISH & RICHARDSON P.C.
P.O. Box 1022
Minneapolis, MN 55440-1022
Tel: (202) 626-6447
Fax: (202) 783-2331

Attorneys for Patent Owner
Paice LLC & Abell Foundation, Inc.

