

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. 7,237,634 to Severinsky et al.

IPR Case No.: IPR2015-00801

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**PETITIONER'S RESPONSE TO PATENT OWNER'S  
MOTION FOR OBSERVATIONS ON CROSS EXAMINATION**

**Updated List of Exhibits**

<b>Exhibit No.</b>	<b>Description</b>	<b>Identifier</b>
1851	U.S. Patent No. 7,237,634 issued to Severinsky <i>et al.</i> (July 3, 2007)	'634 Patent
1852	Declaration of Jeffery L. Stein, Ph.D.	Stein
1853	Paice LLC v. Ford Motor Company, Case No. 1:14-cv-00492, District of MD, Baltimore Div., Complaint (Feb. 19, 2014) (Ex. 1853 at 2-51.)  Service (Feb. 25, 2014) (Ex. 1853 at 1.)  Letter from Ford to Paice (Sept. 22, 2014) (Ex. 1853 at 52.)	Ford Litigation
1854	U.S. Patent No. 5,343,970 issued to Severinsky (Sept. 6, 1994)	Severinsky '970
1855	U.S. Patent No. 5,865,263 issued to Yamaguchi <i>et al.</i> (Feb. 2, 1999)	Yamaguchi
1856	U.S. Patent No. 5,823,280 issued to Lateur (Oct. 20, 1998)	Lateur
1857	U.S. Patent No. 5,623,104 issued to Suga (Apr. 22, 1997)	Suga
1858	Oreste Vittone et al., FIAT Research Centre, <i>Fiat Conceptual Approach to Hybrid Car Design</i> , 12th International Electric Vehicle Symposium, Volume 2 (1994), (available at <a href="https://www.worldcat.org/title/symposium-proceedings-12th-international-electric-vehicle-symposium-december-5-7-1994-disneyland-hotel-and-convention-center-anaheim-california/oclc/32209857&amp;referer=brief_results">https://www.worldcat.org/title/symposium-proceedings-12th-international-electric-vehicle-symposium-december-5-7-1994-disneyland-hotel-and-convention-center-anaheim-california/oclc/32209857&amp;referer=brief_results</a> .)	Vittone
1859	U.S. Patent No. 5,842,534 issued to Frank (Dec. 1, 1998)	Frank
1860	USPN 7,237,634 File History	'634 File History
1861	Toshifumi Takaoka et al., <i>A High-Expansion Ratio Gasoline Engine for the Toyota Hybrid System</i> , published as part of Toyota Technical Review,	Takaoka

Exhibit No.	Description	Identifier
	<p><i>Prevention of Global Warming</i>, Vol. 47, No. 2 (Toyota Motor Corporation, April 1998) (Ex. 1861 at 1-8.) (available at: <a href="https://www.worldcat.org/title/a-high-expansion-ratio-gasoline-engine-for-the-toyota-hybrid-system/oclc/205516653&amp;referer=brief_results.">https://www.worldcat.org/title/a-high-expansion-ratio-gasoline-engine-for-the-toyota-hybrid-system/oclc/205516653&amp;referer=brief_results.</a>)</p> <p>Declaration of Walt Johnson and Exhibit A (Dec. 23, 2014) (Ex. 1861 at 9-19.)</p>	
1862	USPN 7,104,347 File History Excerpts	'347 File History
1863	<p>Paice LLC v. Toyota Motor Corp. et al., Case No. 2:04-cv-211, E.D. Texas, Paice Opening Claim Construction Brief (Mar. 8, 2005) (Ex. 1863 at 1-40.)</p> <p>Paice Claim Construction Reply Brief (Mar. 29, 2005) (Ex. 1863 at 41-79.)</p> <p>Claim Construction Order (Sept. 28, 2005) (Ex. 1863 at 80-130.)</p> <p>Paice LLC v. Toyota Motor Corp. et al., Case No. 2:07-cv-180 (Paice Opening Claim Construction Brief (June 25, 2008) (Ex. 1863 at 131-165.)</p> <p>Paice Claim Construction Reply Brief (Aug. 1, 2008) (Ex. 1863 at 166-191.)</p> <p>Claim Construction Order (Dec. 5, 2008) (Ex. 1863 at 192-220.)</p>	Toyota Litigation
1864	<p>Paice LLC v. Hyundai Motor Corp. et al., Case No. 1:12-cv-0499, District of MD, Baltimore Div., Paice Opening Claim Construction Brief (Nov. 14, 2013) (Ex. 1864 at 1-37.)</p> <p>Paice Responsive Brief on Claim Construction (Dec. 16, 2013) (Ex. 1864 at 38-81.)</p>	Hyundai Litigation

Exhibit No.	Description	Identifier
	Claim Construction Order (Ex. 1864 at 82-122.)	
1865	<p>Decision of Institution, IPR2014-00570, Paper 10 (Sept. 30, 2014) (Ex. 1865 at 1-13.)</p> <p>Excerpts from Public Patent Owner Preliminary Response, IPR2014-00571, Paper 11, (July 11, 2014) (Ex. 1865 at 14-23.)</p> <p>Excerpts from Public Patent Owner Preliminary Response, IPR2014-00579, Paper 11, (July 11, 2014) (Ex. 1865 at 24-33.)</p> <p>Decision of Institution, IPR2014-00571, Paper 12, (Sept. 30, 2014) (Ex. 1865 at 34-50.)</p> <p>Decision of Institution, IPR2014-00579, Paper 12, (Sept. 30, 2014) (Ex. 1865 at 51-64.)</p> <p>Decision of Institution, IPR2014-00904, Paper 13, (Dec. 12, 2014) (Ex. 1865 at 65-78.)</p> <p>Excerpts from Public Patent Owner Preliminary Response, IPR2014-01415, Paper 9, (Dec. 16, 2014) (Ex. 1865 at 79-96.)</p> <p>Patent Owner Response, IPR2014-00571, Paper 20 (January 21, 2015) (Ex. 1865 at 97-162.)</p> <p>Patent Owner Response, IPR2014-00579, Paper 20 (January 21, 2015) (Ex. 1865 at 163-226.)</p> <p>Patent Owner Response, IPR2014-00570, Paper 22 (January 21, 2015) (Ex. 1865 at 227-292.)</p>	Ford IPRs
1866	U.S. Patent No. 7,104,347 issued to Severinsky <i>et al.</i> (Sep. 12, 2006)	'347 Patent
1867	Curriculum Vitae of Jeffery L. Stein	Jeff Stein CV
1868	John B. Heywood, <i>Internal Combustion Engine</i>	Heywood

Exhibit No.	Description	Identifier
	<i>Fundamentals</i> (McGraw-Hill 1988) (available at <a href="http://catalog.loc.gov/vwebv/holdingsInfo?searchId=20946&amp;recCount=25&amp;recPointer=4&amp;bibId=2421798">http://catalog.loc.gov/vwebv/holdingsInfo?searchId=20946&amp;recCount=25&amp;recPointer=4&amp;bibId=2421798</a> .)	
1869	Willard W. Pulkrabek, <i>Engineering Fundamentals of the Internal Combustion Engine</i> (Prentice Hall, 1997) (available at <a href="http://catalog.loc.gov/vwebv/holdingsInfo?searchId=10003&amp;recCount=25&amp;recPointer=1&amp;bibId=2109503">http://catalog.loc.gov/vwebv/holdingsInfo?searchId=10003&amp;recCount=25&amp;recPointer=1&amp;bibId=2109503</a> .)	Pulkrabek
1870	Hawley, G.G., <i>The Condensed Chemical Dictionary</i> , Van Nostrand Reinhold Co., 9th ed. (1977) (available at <a href="http://catalog.loc.gov/vwebv/holdingsInfo?searchId=21541&amp;recCount=25&amp;recPointer=14&amp;bibId=1289584">http://catalog.loc.gov/vwebv/holdingsInfo?searchId=21541&amp;recCount=25&amp;recPointer=14&amp;bibId=1289584</a> .)	Hawley
1871	U.S. Patent No. 913,846 issued to Pieper (Mar. 2, 1909)	Pieper
1872	Michael Duoba, Ctr. for Transp. Research, Argonne Nat'l Lab., <i>Challenges for the Vehicle Tester in Characterizing Hybrid Electric Vehicles</i> , 7th CRC on Road Vehicle Emissions Workshop (April 1997) (available at <a href="http://www.osti.gov/scitech/biblio/516019">http://www.osti.gov/scitech/biblio/516019</a> .)	Duoba
1873	Society of Automotive Engineers Special Publication, <i>Technology for Electric and Hybrid Vehicles</i> , SAE SP-1331 (February 1998) (available at <a href="http://www.worldcat.org/title/technology-for-electric-and-hybrid-vehicles/oclc/39802642">http://www.worldcat.org/title/technology-for-electric-and-hybrid-vehicles/oclc/39802642</a> .)	SP-1331
1874	Catherine Anderson & Erin Pettit, <i>The Effects of APU Characteristics on the Design of Hybrid Control Strategies for Hybrid Electric Vehicles</i> , SAE Technical Paper 950493, published as part of Society of Automotive Engineers Special Publication, <i>DESIGN INNOVATIONS IN Electric AND Hybrid Electric Vehicles</i> , SAE SP-1089 (February, 1995) (available at	Anderson

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