

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**BENTLEY MOTORS LIMITED
and
BENTLEY MOTORS, INC.
Petitioner**

v.

**JAGUAR LAND ROVER LIMITED
Patent Owner**

**IPR2019-01539
U.S. Patent No. RE46,828**

PETITIONER'S SUPPLEMENTAL BRIEF

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Bentley Exhibits for IPR2019-1539

Exhibit Number	Exhibit Name
1001	U.S. Patent No. RE 46,828 (“the ’828 patent”)
1002A	Bantle/Bott, The Porsche 959-Group B – a Very Special Automobile – Part 1, Automobiltechnische Zeitschrift 88 (May, 1986) No. 5, pp. 265-270 (“ATZ”)
1002B	Bantle/Bott, The Porsche 959-Group B – a Very Special Automobile – Part 2, ATZ 88 (June, 1986) No. 6, pp. 353-356
1002C	Bantle/Bott, The Porsche 959-Group B – a Very Special Automobile – Part 3, ATZ 88 (July/August 1986) No. 7/8, pp. 407-413
1002D	Bantle/Bott, The Porsche 959-Group B – a Very Special Automobile – Part 4, ATZ 88 (September 1986) No. 9, pp. 509-513
1002E	Public Availability Statement from the British Library
1003	Porsche 959 Driver’s Manual
1004	Expert Declaration of Dr. Glenn R. Bower
1005	GB 2,273,580
1006	U.S. Patent No. 6,044,318
1007	1997 Ford Expedition Owner’s Guide
1008A	2001 BMW 7-Series Owner’s Manual
1008B	2001 BMW 7-Series Owner’s Manual, Service and Warranty Information
1009	2002 Montero Sport Owner’s Manual
1010	Intentionally Left Blank
1011	Intentionally Left Blank
1012	Hummer H2 Media Page, Internet Archive, December 21, 2011
1013	2003 Hummer H2 Owner’s Manual
1014A	H2 Chassis Article from Hummer H2 Press Kit
1014B	H2 Exterior Article from Hummer H2 Press Kit
1014C	H2 Interior Article from Hummer H2 Press Kit
1014D	H2 Overview Article from Hummer H2 Press Kit
1014E	H2 Powertrain Article from Hummer H2 Press Kit
1014F	H2 Safety Article from Hummer H2 Press Kit
1014G	H2 Specs Article from Hummer H2 Press Kit
1015	Affidavit of Christopher Butler from the Internet Archives regarding the H2 Powertrain Article (the Hummer Article)

Exhibit Number	Exhibit Name
1016	Mitsubishi Motors Press Release – MMC launches Lancer Evolution VII (January 26, 2001)
1017	2001 Mitsubishi Lancer Evolution VII Press Information
1018	2000 Range Rover Owner’s Handbook
1019	2001 Chevy Tahoe Owner’s Manual
1020	2001 Mercedes C-Class Operator’s Manual
1021	Prosecution File History for the ’828 patent
1022	Prosecution File History for the ’776 patent
1023	U.S. Patent No. 7,349,776
1024	EPO File History for 3,252,006
1025	GB 2,154,763
1026	U.S. Patent No. 5,941,614
1027	U.S. Patent No. 6,280,859
1028	U.S. Patent No. 5,997,108
1029	Phillips, David, Hummer H2 SUT concept storms N.Y., Automotive News (April 10, 2018)
1030	Hans-Martin Streib and Hubert Bischof, <i>Electronic Throttle Control (ETC): A Cost Effective System for Improved Emissions, Fuel Economy, and Driveability</i> , SAE International 960338 (1996).
1031	Constantine, Chris, <i>This Paris-Dakar Porsche 959 Rally Car May Bring in \$3.4 Million at Auction</i> , The Drive (June 30, 2018)
1032	Garrick Forckenbrock et al., <i>A Comprehensive Light Vehicle Antilock Brake System Test Track Performance Evaluation</i> , SAE INTERNATIONAL 1999-01-1287 (1999).
1033	2003 Lexus GX 470 Owner’s Manual
1034	2002 Nissan Pathfinder Owner’s Manual
1035	2002 Infinity QX4 Owner’s Manual
1036	Ford Press Release (Feb. 8, 1999)
1037	Frank, Michael, <i>The Best of the New York Auto Show</i> , Forbes (April 16, 2001)
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1041	Honda News, 1990 Honda Accord – Drivetrain (April 1, 1989)
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1043	Mitsubishi Pajero Showroom Catalog

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