UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD
BAYERISCHE MOTOREN WERKE AKTIENGESELLSCHAFT and BMW OF NORTH AMERICA, LLC, Petitioners,
V.
PAICE LLC and THE ABELL FOUNDATION, INC., Patent Owners.
Case IPR2020-00994 Patent 7,104,347





TABLE OF CONTENTS

I.	Introduction1				
II.	Technology Overview5				
	A.	The Technology of the '347 Patent			
	B.	Overview of Severinsky's Parallel Hybrid vs. Nii's Series Hybrid12			
IV.	Claiı	Claim Construction1			
V.	BMW's Grounds Fail To Demonstrate Obviousness17				
	A.	Grounds 3a and 3b – Severinsky in View of Nii Does Not Render Claims 2 and 24 Obvious			
		Neither Severinsky nor Nii teaches or suggests "varying said setpoint accordingly"			
		2. BMW's Reasons to Combine Are Flawed			
	B.	Grounds 1a and 2a – Severinsky in View of Graf Does Not Render Claims 2 and 24 Obvious			
	C.	Grounds 1b and 2b – Severinsky in View of Ma Does Not Render Claims 11 and 33 Obvious			
	D.	Grounds 1c and 2c – Severinsky in View of Ehsani Does Not Render Claims 38 and 17 Obvious			
	E.	Ground 4a – The Bumby References in View of Graf Does Not Render Claims 2 and 24 Obvious			
		The Bumby References/Graf combination does not teach or suggest "monitor[ing] patterns of vehicle operation over time"			
		2. The Bumby References/Graf combination does not teach or suggest "varying said setpoint accordingly"			
	F.	Ground 4b – The Bumby References in view of Ma do not render Claims 11 and 33 obvious			
	G.	Ground 4c – The Bumby References in View of Ehsani Does Not Render Claims 38 and 17 Obvious			
		1. The Bumby References in view of Ehsani do not teach or suggest "wherein the speeds of said engine and/or first motor and of said second motor <i>are controlled such that when</i> said			



VI.	Conclusion .		75
		The Bumby References in view of Ehsani do not render claim 17 obvious	
		clutch is engaged the speeds of the first and second output shafts are substantially equal" (claim 38)	71



EXHIBIT LIST

Exhibit No.	Description
PAICE 2001	Patent Owners' Preliminary Response to Petition for IPR in
	IPR2014-00571 Dated July 11, 2014
PAICE 2002	Patent Owner's Response to Petition in IPR2014-00884 dated
	March 10, 2015
PAICE 2003	Decision on Institution in IPR2015-00794 dated November 2,
	2015
PAICE 2004	Decision on Institution in IPR2015-00795 dated November 2,
	2015
PAICE 2005	Petition for IPR in IPR2014-00571 dated April 4, 2014
PAICE 2006	Response to Interrogatory 27, BMW Responses to PAICE 1st
	Set of Interrogatories [1-28] dated May 6, 2020
PAICE 2007	Paice/Toyota Complaint dated June 8, 2004
PAICE 2008	Paice/Toyota Amended Complaint dated July 3, 2007
PAICE 2009	Scheduling Order [Docket No. 36] from 1:19-cv-03348-SAG
	(USDC-DMD) dated February 25, 2020
PAICE 2010	Docket Navigator Statistics – Top Patents by Number of IPRs
PAICE 2011	Ex. E to BMW Invalidity Contentions dated June 8, 2020
PAICE 2012	Ex. C to BMW Invalidity Contentions dated June 8, 2020
PAICE 2013	IPR2017-00226 Petition dated November 14, 2016
PAICE 2014	UK Patent Application GB 2,318,105 Cover Page
PAICE 2015	Printout of http://www.paicehybrid.com/licensing-agreements/
PAICE 2016	Declaration of Mahdi Shahbakhti, Ph.D.
PAICE 2017	Curriculum Vitae of Mahdi Shahbakhti, Ph.D.
PAICE 2018	Bosch Gasoline-engine Management
PAICE 2019	Selected Pages From John Heywood, Internal Combustion
	Engines Fundamentals
PAICE 2020	Selected Pages From Merhdad Ehsani et al, Modern Electric,
	Hybrid Electric, and Fuel Cell Vehicles
PAICE 2021	Matthew Cuddy et al., Analysis of the Fuel Economy Benefit
	of Drivetrain Hybridization
PAICE 2022	Selected Pages From Draft Technical Assessment Report:
	Midterm Evaluation of Light-Duty Vehicle Greenhouse Gas
	Emission Standards and Corporate Average Fuel Economy
	Standards for Model Years 2022-2025
PAICE 2023	Selected Pages From Assessment of Fuel Economy of Fuel
	Economy Technologies for Light Duty Vehicles



PAICE 2024	Selected Pages From Richard Stone, Introduction to Internal
	Combustion Engines
PAICE 2025	Heinz Heisler, Advanced Vehicle Technology, SAE
PAICE 2026	Hitoshi Inoue et al., A Performance Improvement in Idle-Speed
	Control System with Feedforward Compensation for the
	Alternator Load Current, SAE
PAICE 2027	Satoru Watanabe, Development of Model-Following Idle
	Speed Control System Incorporating Engine Torque Models,
	SAE
PAICE 2028	Guzzella et al., Introduction to Modeling Control of Internal
	Combustion Engine Systems



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