### 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 IPR2020-01299 Patent 8,630,761

#### PATENT OWNERS' RESPONSE

DOCKET

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2. No reason to combine Severinsky and Quigley
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#### **EXHIBIT LIST**

Exhibit Number	Description
2001	BMW's Opening Claim Construction Brief from <i>Paice LLC</i> and the Abell Foundation v. Bayerische Motoren Werke Aktiengesellschaft and BMW of North AmericA, LLC, Civil Action No. 19-CV-3348-SAG, filed August 7, 2020
2002	Docket Navigator Statistics – Top Patents by Number of IPRs
2003	Printout of http://www.paicehybrid.com/licensing- agreements/
2004	Scheduling Order [Docket No. 36] from <i>Paice LLC and the</i> <i>Abell Foundation v. Bayerische Motoren Werke</i> <i>Aktiengesellschaft and BMW of North America, LLC</i> , Civil Action No. 1:19-cv-03348-SAG (USDC-DMD) dated February 25, 2020
2005	Ex. P to BMW Invalidity Contentions dated June 8, 2020
2006	BMW's Responsive Claim Construction Statement from Paice LLC and the Abell Foundation v. Bayerische Motoren Werke Aktiengesellschaft and BMW of North America, LLC, Civil Action No. 19-CV-3348-SAG, served August 7, 2020
2007	Markman Order from Paice LLC and the Abell Foundation v. Bayerische Motoren Werke Aktiengesellschaft and BMW of North America, LLC, Civil Action No. 19-CV-3348- SAG, filed October 26, 2020
2008-2015	Reserved
2016	Declaration of Mahdi Shahbakhti, Ph.D.
2017	Curriculum Vitae of Mahdi Shahbakhti, Ph.D.
2018-2019	Reserved
2020	Selected Pages From Merhdad Ehsani et al, Modern Electric, Hybrid Electric, and Fuel Cell Vehicles
2021	Reserved

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2022-2028	Reserved
2029	Oxford Dictionary
2030	The Illustrated Dictionary of Electronics
2031	Encarta World English Dictionary
2032	Handbook of Air Pollution From Internal Combustion Engines
2033	Guzzella et al., Vehicle Propulsion Systems
2034	Deposition Transcript of Gregory Davis, Ph.D.
2035	BMW's Reply Claim Construction Brief from <i>Paice LLC</i> and the Abell Foundation v. Bayerische Motoren Werke Aktiengesellschaft and BMW of North AmericA, LLC, Civil Action No. 19-CV-3348-SAG, filed August 7, 2020

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