

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**BAYERISCHE MOTOREN WERKE AKTIENGESELLSCHAFT &
BMW OF NORTH AMERICA, LLC**
Petitioners

v.

PAICE LLC & THE ABELL FOUNDATION, INC.
Patent Owners

Inter Partes Review No.: IPR2020-01299

U.S. Patent No. 8,630,761

PETITIONERS' REPLY TO PATENT OWNERS' RESPONSE

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List of Exhibits

| Exhibit No. | Description of Exhibit |
|---------------------|---|
| BMW1001 | U.S. Patent No. 8,630,761 |
| BMW1002 | USPTO Assignments on the Web for U.S. Patent No. 7,104,347 K2 |
| BMW1003 | <i>Ford Motor Co. v. Paice LLC</i> , IPR2014-00571, Paper 44, Final Written Decision (P.T.A.B. Sep. 28, 2015) |
| BMW1004 | <i>Ford Motor Co. v. Paice LLC</i> , IPR2014-00579, Paper 45, Final Written Decision (P.T.A.B. Sep. 28, 2015) |
| BMW1005 | <i>Paice LLC v. Ford Motor Co.</i> , Appeal Nos. 2016-1412, -1415, -1745, Doc. 46-2, Opinion (Fed. Cir. Mar. 7, 2017) |
| BMW1006 | <i>Ford Motor Co. v. Paice LLC</i> , IPR2015-00794, Paper 31, Final Written Decision (P.T.A.B. Nov. 1, 2016) |
| BMW1007 | <i>Paice LLC v. Ford Motor Co.</i> , Appeal Nos. 2017-1442, -1443, Doc. 59-2, Opinion (Fed. Cir. Feb. 1, 2018) |
| BMW1008 | Declaration of Dr. Gregory W. Davis in Support of <i>Inter Partes</i> Review of U.S. Patent No. 8,630,761 |
| BMW1009 | <i>Curriculum Vitae</i> of Dr. Gregory W. Davis, Ph.D., P.E. |
| BMW1010 | <i>Ford Motor Co. v. Paice LLC</i> , IPR2015-00795, Paper 31, Final Written Decision (P.T.A.B. Nov. 1, 2016) |
| BMW1011 | <i>Ford Motor Co. v. Paice LLC</i> , IPR2014-00884, Paper 38, Final Written Decision (P.T.A.B. Dec. 10, 2015) |
| BMW1012 | RESERVED |
| BMW1013 | U.S. Patent No. 5,343,970 (“Severinsky”) |
| BMW1014- BMW1019 | RESERVED |

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| BMW1020 | U.S. Patent No. 6,188,945 (“Graf”) |
| BMW1021 | RESERVED |
| BMW1022 | U.S. Patent No. 5,650,931 (“Nii”) |
| BMW1023 | <i>Innovations in Design: 1993 Ford Hybrid Electric Vehicle Challenge</i> , Society of Automotive Engineers, SAE/SP-94/980, Davis, G.W. et al., “United States Naval Academy, AMPhibian” (Feb. 1994), 277-87 |
| BMW1024 | <i>1996 Future Car Challenge</i> , Society of Automotive Engineers, SAE/SP-97/1234, Swan, J. et al., “Design and Development of Hyades, a Parallel Hybrid Vehicle for the 1996 FutureCar Challenge” (Feb. 1997), 23-30 |
| BMW1025 | <i>1997 Future Car Challenge</i> , Society of Automotive Engineers, SAE/SP-98/1359, Swan, J. et al., “Design and Development of Hyades, a Parallel Hybrid Electric Vehicle for the 1997 FutureCar Challenge” (Feb. 1998), 29-39 |
| BMW1026 | RESERVED |
| BMW1027 | Wakefield, E.H., Ph.D., <i>History of the Electric Automobile – Hybrid Electric Vehicles</i> , Society of Automotive Engineers, SAE/SP-98/3420 (1998), 17-34 (Chapter 2: The History of the Petro-Electric Vehicle) |
| BMW1028 | Unnewehr, L.E. et al., “Hybrid Vehicle for Fuel Economy,” Society of Automotive Engineers, SAE/SP-76/0121 (1976) |
| BMW1029 | Burke, A.F., “Hybrid/Electric Vehicle Design Options and Evaluations,” Society of Automotive Engineers, SAE/SP-92/0447, International Congress & Exposition, Detroit, Michigan (Feb. 24-28, 1992) |
| BMW1030 | Duoba, M, “Challenges for the Vehicle Tester in Characterizing Hybrid Electric Vehicles,” 7 th CRC On Road Vehicle Emissions Workshop, San Diego, California (Apr. 9-11, 1997) |
| BMW1031 | <i>Electric and Hybrid Vehicles Program, 18th Annual Report to Congress for Fiscal Year 1994</i> , U.S. Department of Energy |

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| | (Apr. 1995) |
| BMW1032 | Bates, B. et al., "Technology for Electric and Hybrid Vehicles," Society of Automotive Engineers, SAE/SP-98/1331 (Feb. 1998) |
| BMW1033 | Stodolsky, F. et al., "Strategies in Electric and Hybrid Vehicle Design," Society of Automotive Engineers, SAE/SP-96/1156, Kozo, Y. et al., "Development of New Hybrid System – Dual System," SAE/SP-96/0231 (Feb. 1996), 25-33 |
| BMW1034 | Leschly, K.O., <i>Hybrid Vehicle Potential Assessment, Volume 7: Hybrid Vehicle Review</i> , U.S. Department of Energy (Sep. 30, 1979) |
| BMW1035 | RESERVED |
| BMW1036 | Masding, P.W., et al., "A microprocessor controlled gearbox for use in electric and hybrid-electric vehicles," <i>Transactions of the Institute of Measurement and Control</i> , Vol. 10, No. 4 (July –Sep. 1988), 177-86 |
| BMW1037- BMW1038 | RESERVED |
| BMW1039 | Davis, G.W., Ph.D. et al., <i>Introduction to Automotive Powertrains</i> , Chapter 2: Road Loads (2000), 27-68 |
| BMW1040 | Ehsani, M. et al., "Propulsion System Design of Electric Vehicles," Texas A&M University, Department of Electrical Engineering (1996), 7-13 |
| BMW1041 | Ehsani, M. et al., "Propulsion System Design of Electric and Hybrid Vehicles," <i>IEEE Transactions on Industrial Electronics</i> , Vol. 44, No. 1 (Feb. 1997), 19-27 |
| BMW1042 | Bauer, H., ed., <i>Automotive Handbook</i> , Robert Bosch GmbH (4th Ed. Oct. 1996), Excerpts |
| BMW1043 | <i>Design Innovations in Electric and Hybrid Electric Vehicles</i> , Society of Automotive Engineers, SAE/SP-96/1089, Anderson, C., et al., "The Effects of APU Characteristics on the Design of Hybrid Control Strategies for Hybrid Electric Vehicles," |

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