EXHIBIT P

EXHIBIT P

Obviousness of U.S. Patent No. 8,630,761 Claims 1-12 over Severinsky '970 in View of One or More Sec

To the extent Severinsky '970 does not disclose any particular limitation below, or aspects thereof, expressly or i limitation(s) would have been known to a person of skill in the art and/or it would have been obvious to combine with one or more of the prior art references identified and cited herein, including Adler, Drozdz, Farrall, Frank, F Hosaka '083, Hosaka '697, Moroto, Nii, Onari, Probst, and Quigley.

U.S. Patent No. 8,630,761	Severinsky '970[1] + One or More of Secondary Refe
1[pre]. A method of operation of a hybrid vehicle, comprising steps of:	Severinsky '970 discloses a "Hybrid Electric Vehicle" and a "An imp electric vehicle includes an internal combustion engine and an electri Severinsky '970 at Abstract. *See also* 1:6-14; 5:25-37; 7:45-46; 9:37 Figure 3 illustrates the "schematic diagram of the principal compone … hybrid vehicle drive system." Severinsky '970 at 7:45-46. Severinsky '970 at Fig. 3:

[1] U.S. Patent No. 5,343,970 ("Severinsky '970")
[2] U.S. Patent No. 5,533,583 ("Adler"); U.S. Patent No. 5,898,282 ("Drozdz"); U.S. Patent No. 5,656,921 ("Farra 6,116,363 ("Frank"); U.S. Patent No. 5,788,004 ("Friedmann"); U.S. Patent No. 6,188,945 ("Graf"); U.S. Patent ("Hosaka '083"); U.S. Patent No. 4,625,697 ("Hosaka '697"); U.S. Patent No. 5,697,466 ("Moroto"); U.S. Paten ("Nii"); U.S. Patent No. 5,189,621 ("Onari"); UK Patent Application No. GB 2,318,105 ("Probst"); C.P. Quigley *Use of a Hybrid Electric Vehicle*, IFAC Workshop on Intelligent Components for Autonomous and Semi-Autono (1996) 129-134 ("Quigley")

EXHIBIT P

Obviousness of U.S. Patent No. 8,630,761 Claims 1-12 over Severinsky '970 in View of One or More Sec

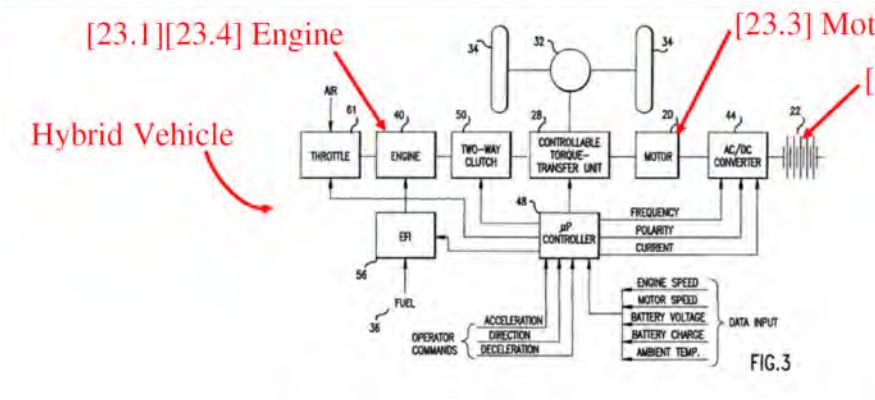
U.S. Patent No. 8,630,761	Severinsky '970[1] + One or More of Secondary Refe
	 Figures 4-9 refer to "schematic diagrams of the hybrid drive system a invention operating in different modes and showing flow of energy, i electrical energy or fossil fuel, and of power, as torque from either th the internal combustion engine." Severinsky '970 at 7:47-52; *see als* "Like claim 23, Severinsky ['970] discloses the essential component vehicle, including an internal combustion engine, an electric motor, a battery, and a microprocessor for controlling the vehicle's mode of o electric mode, an engine-only mode, or a hybrid mode." IPR2014-00 Decision, page 14.
[a] storing and supplying electrical power from a battery bank,	Severinsky '970 discloses a "battery 22." Severinsky '970 at 9:65-6 discloses that "battery 22 is charged by power generated by the moto as a generator, that is, when driven by the engine 40 by way of the co transfer unit 28, or in a regenerative braking mode." Severinsky '97 Severinsky also discloses that the electric motor 20 will be "powered a relatively large, high voltage battery pack 22." BMW 1013 at 10:5

EXHIBIT P

Obviousness of U.S. Patent No. 8,630,761 Claims 1-12 over Severinsky '970 in View of One or More Sec

U.S. Patent No. 8,630,761	Severinsky '970[1] + One or More of Secondary Refe
	Further, the '761 Patent itself acknowledges that Severinsky '970 dis "electric motor powered by electrical energy stored in a substantial b the vehicle." '761 Patent at 24:23-40.
[b] applying torque to road wheels of said hybrid vehicle from one or both of an internal combustion engine and at least one traction motor, and	Severinsky '970 discloses an "engine 40" and relates to a hybrid veh the "relative power outputs of the internal combustion engine and the such that the engine is operated only within its most efficient operati Severinsky '970 at 9:40-46. Severinsky '970 is able to restrict opera its most efficient range by sizing the "internal combustion engine of to supply adequate power for highway cruising, preferably with some reverse, so that the internal combustion engine operates only in its m operating range." Severinsky '970 at 9:47-52. With reference to Figure 3, Severinsky '970 explains that "both the e motor 20 provide torque to the drive wheels 34 by way of the control unit 28. Severinsky '970 at 10:24-26; Fig. 3. Severinsky '970 also discloses "the internal combustion engine is op most efficient conditions of output power and speed." Severinsky '9 Severinsky '970 further recognizes that these conditions of "output p are met when the "internal combustion engine is run only in the near efficient operational point, that is, such that it produces 60-90% of its whenever operated." Severinsky '970 at 20:63-66, 7:8-16. Severinsky '970 discloses an "electric motor 20." Severinsky '970 a Severinsky '970 also discloses that the "electric motor 20" is capable "output torque from motor 20 [] transmitted by way of torque transfe conventional differential 32 to the vehicle drive wheels 34." Severin 57, Abstract, 10:52-11:6. The '761 patent itself states that "an important aspect of the inventio '970 patent, substantially improved efficiency is afforded by operatin

EXHIBIT P

Obviousness of U.S. Patent No. 8,630,761 Claims 1-12 over Severinsky '970 in View of One or More Sec

U.S. Patent No. 8,630,761	Severinsky '970[1] + One or More of Secondary Refe
	combustion engine only at relatively high torque output levels, typica preferably at least 50% of peak torque. When the vehicle operating c torque of this approximate magnitude, the engine is used to propel th torque is required, an electric motor powered by electrical energy sto battery bank drives the vehicle; when more power is required than pr engine or the motor, both are operated simultaneously." '761 patent a
[c] controlling flow of torque between said internal combustion engine, said at least one traction motor, and said road wheels, and	Severinsky '970 discloses that the "torque transfer unit 28 receives to and/or from alternating current electric motor 20 and transmits this to wheels 34 of the vehicle by way of a conventional differential 32." S 9:61-65. With reference to Figure 3, Severinsky '970 discloses that "micropro the flow of torque between the motor 20, the engine 40, and the whe the mode of operation of the vehicle. For example, when the vehicle highway, all torque is preferably supplied from the engine 40. Howe starts down a hill, and the operator lifts his foot from the accelerator energy of the vehicle and the engine's excess torque may be used to c a generator so as to charge the batteries. If the vehicle then starts to c motor 20 is used to supplement the output torque of engine 40. Simil can be used to start the engine 40, e.g., when accelerating in traffic o various modes of operation of the system will be described below in FIGS. 4-9, after which further details of the various elements of the s Severinsky '970 at 10:28-43. Severinsky '970 discloses a "microprocessor controller 48" that cont directional flow of power between the battery 22 and the motor 20." 9:58-10:23. The "microprocessor controller 48" also controls the tor engine and "electric motor 20" to the road wheels using the "controll unit 28." Severinsky '970 at 12:64-13:2, 22:19-28.

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.