EXHIBIT J

EXHIBIT J

Obviousness of U.S. Patent No. 7,237,634 Claims 33-44, 46, 49, 50, 52-55, 68, 105, 188, 189, 199-206, 208, 2 over Severinsky '970 in View of One or More of Secondary References

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, Anderson, Drozdz, Farra Graf, Hosaka '083, Hosaka '697, Kawamura, Lateur, Ma, Moroto, Nii, Onari, Paefgen, Probst, Quigley, Suga, V Yamaguchi.

U.S. Patent No. 7,237,634	Severinsky '970[1] + One or More Secondary Refere
33[pre]. A method for controlling a hybrid vehicle, comprising:	Severinsky '970 discloses a "Hybrid Electric Vehicle" and a "metho hybrid electric vehicle." Severinsky '970 at Abstract. Figure 3 illust diagram of the principal components of [the disclosed] … hybrid veh 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"); C. Anderson, et al., *The Effects of APU Characteristics on the Design of I Strategies for Hybrid Electric Vehicles*, SAE Technical Paper 950493 (1995) ("Anderson"); U.S. Patent No. 5,89 U.S. Patent No. 5,656,921 ("Farrall"); U.S. Patent No. 6,116,363 ("Frank"); U.S. Patent No. 5,788,004 ("Friedm No. 6,188,945 ("Graf"); U.S. Patent No. 4,721,083 ("Hosaka '083"); U.S. Patent No. 4,625,697 ("Hosaka '697") 4,850,193 ("Kawamura"); U.S. Patent No. 5,823,280 ("Lateur"); WO 92/15778 ("Ma"); U.S. Patent No. 5,697,4 Patent No. 5,650,931 ("Nii"); U.S. Patent No. 5,189,621 ("Onari"); Paefgen, et al., *Der Audi Duo – das erste ser Hybridfahrzeug*, ATZ Automobiletechnische Zeitschrift 99 (1997) 6, p. 316-32 ("Paefgen"); U.K. Patent Applic 2 318 105 ("Probst"); C.P. Quigley, et al., *Predicting the Use of a Hybrid Electric Vehicle*, IFAC Workshop on I Components for Autonomous and Semi-Autonomous Vehicles 29(4) (1996) 129-134 ("Quigley"); U.S. Patent N ("Suga"); O. Vittone, et al., *Fiat Conceptual Approach to Hybrid Cars Design*, 12th International Electric Vehicl ("Vittone"); U.S. Patent No. 5,865,263 ("Yamaguchi").

EXHIBIT J

Obviousness of U.S. Patent No. 7,237,634 Claims 33-44, 46, 49, 50, 52-55, 68, 105, 188, 189, 199-206, 208, 2 over Severinsky '970 in View of One or More of Secondary References

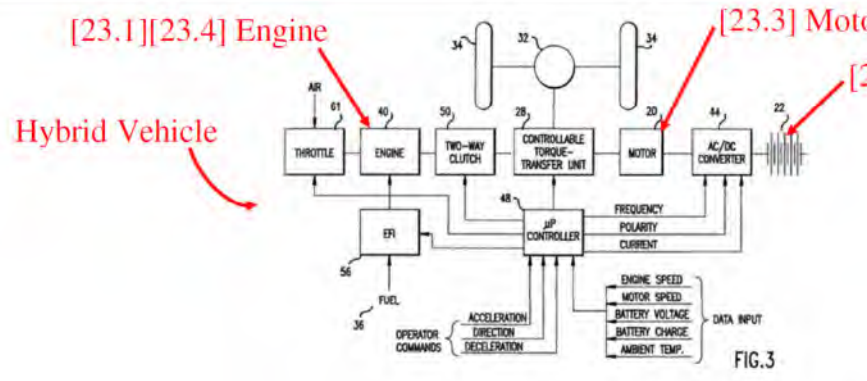
U.S. Patent No. 7,237,634	Severinsky '970[1] + One or More Secondary Refere
	 "Like claim 23, Severinsky ['970] discloses the essential component vehicle, including an internal combustion engine, an electric motor, a battery, and a microprocessor for controlling the vehicle's mode of o electric mode, an engine-only mode, or a hybrid mode." IPR2014-00 Decision, page 14. *See also* IPR2015-00801, Final Written Decision, page 20 ("We find is disclosed by Severinsky '970.").
[a] determining instantaneous road load (RL) required to propel the hybrid vehicle responsive to an operator command;	Severinsky '970 discloses that the "microprocessor 48" determines th torque required for propulsion of the vehicle" so that the engine is op its most efficient operating range. Severinsky '970 at 16:67-17:15. discloses that the "microprocessor 48" determines whether the "engi or both "the engine 40 and the motor 20" should be operated in order "instantaneous torque required for propulsion of the vehicle." Sever 43.

EXHIBIT J

Obviousness of U.S. Patent No. 7,237,634 Claims 33-44, 46, 49, 50, 52-55, 68, 105, 188, 189, 199-206, 208, 2 over Severinsky '970 in View of One or More of Secondary References

U.S. Patent No. 7,237,634	Severinsky '970[1] + One or More Secondary Refere
	Severinsky '970 also discloses that the vehicle is operated "*responsiv command,*" such as application of "accelerator and brake pedals." S 13:16-21. Severinsky '970 discloses that the "microprocessor 48" determines th instantaneous torque required for propulsion of the vehicle" is negati starts down a hill, and the operator lifts his foot from the accelerator '970 at 10:32-34. During such negative torque requirements, Severi that "the kinetic energy of the vehicle and the engine's excess torque drive the motor 20 as a generator so as to charge the batteries." Seve 10:32-36. Severinsky '970 also teaches a "regenerative braking or c Severinsky '970 at 14:37-53. In this mode the "microprocessor 48" operator's inputs and the vehicle's performance and will determine " torque is available." Severinsky '970 at 14:15-21. Specifically, "the torque required for propulsion of the vehicle" is negative during "do "the kinetic energy of the vehicle will be fed back from the road whe electric motor 20" and stored in the battery. Severinsky '970 at 14:4 Severinsky '970 further discloses that the "microprocessor 48" deter instantaneous torque required for propulsion of the vehicle" may be vehicle "starts to climb a hill." Severinsky '970 at 10:36-37. During requirements "the motor 20 is used to supplement the output torque Severinsky '970 at 10:37-38. Severinsky '970 also discloses that the 48" determines that "the instantaneous torque required for propulsion also be positive when the vehicle is "accelerating and the like." Seve 10:40. During this positive torque requirement the "motor 20" is aga additional power as needed for acceleration." Severinsky '970 at 9:5 Severinsky '970 accounts for external forces that act on the vehicle s "instantaneous torque required for propulsion of the vehicle" may be

EXHIBIT J

Obviousness of U.S. Patent No. 7,237,634 Claims 33-44, 46, 49, 50, 52-55, 68, 105, 188, 189, 199-206, 208, 2 over Severinsky '970 in View of One or More of Secondary References

U.S. Patent No. 7,237,634	Severinsky '970[1] + One or More Secondary Refere
	response to an operator's command and the correct vehicle operation Severinsky '970 at 14:9-18. A skilled artisan would have understood that "wind conditions, road are used to calculate the textbook definition of "road load." Severins specifically acknowledges that the textbook "road load" forces are ac "responsive to the operator's control inputs" (e.g., operation of the ac pedals) in order to determine the "instantaneous torque required to pr It was known prior to September 1998 that the textbook "road load" "the instantaneous torque required for propulsion of the vehicle" to b negative. For instance, "the instantaneous torque required for propul may be negative when traveling downhill, thereby requiring the drive accelerator pedal or press down on the brake pedal in order to slow d acceleration. Alternatively, "the instantaneous torque required for pr vehicle" may be positive when traveling up a hill or when the driver acceleration, thereby requiring the driver to press down the accelerat The '634 Patent also confirms that Severinsky '970 teaches a hybrid an operational mode by determining "the instantaneous torque requir vehicle." '634 Patent at 35:3-17. The '634 Patent itself states that the torque-based control strategy dis Severinsky '970 is employed by the hybrid vehicle disclosed in the ' Patent at 25:4-24. "Although Severinsky describes the use of 'speed' as a factor consid microprocessor, Severinsky makes clear that the microprocessor also 'torque' requirements in determining when to run the engine." IPR2 Written Decision, at 16. "And, while Severinsky may not use the ter expressly, its description of the engine's operation being 'responsive by the vehicle's propulsion requirements' is the same as the engine b

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.