

EXHIBIT B-14

Invalidity of U.S. Patent Nos. 10,961,602 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References

Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”), publicly available within a few weeks of March 13, 2001, qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 for the asserted claims of U.S. Patent No. 10,961,602 (“the ’602 patent”), as discussed in detail in the claim chart below.

The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. As such, nothing in Respondents’ claim charts should be construed as an admission regarding infringement, either literally or under the doctrine of equivalents, or as an admission regarding Respondents’ understanding of the proper scope of the asserted claims. Respondents reserve the right to rely on additional citations or sources of evidence that also may be applicable, or that may become applicable in light of claim construction, changes in Complainant’s infringement contentions, and/or information obtained during discovery as the investigation progresses.

To the extent Complainant allege that Cornette does not disclose any particular limitation of the asserted claims of the ’602 patent, either expressly or inherently, it would have been obvious to a person of ordinary skill in the art as of the priority date of the ’602 patent to modify Cornette and/or to combine the teachings of Cornette with other prior art references, including but not limited to other prior art references discussed in detail in this claim chart, the present prior art references cited in the Cover Pleading, and the relevant section(s) of claim charts for other prior art references for the ’602 patent in a manner that would have rendered the asserted claims invalid as obvious.

Respondents reserve the right to amend or supplement this claim chart at a later date as more fully set forth in the Cover Pleading.

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Claim 1	
[1pre] A precoated steel product comprising:	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. To the extent the preamble of claim 1 is found to be limiting, Cornette and/or one or more prior art references disclose a precoated steel product. For example: “Energy savings are among the most important goals of steel users. Usinor proposes a wide range of very high strength steels (HSLA, DP, TRIP, etc.) for weight reduction and impact resistance. This text deals with the mechanical testing and different design solutions associated with these steel grades. Tensile and formability properties are presented first by means of basic tests (drawing, stretching, bending, etc.) in order to classify the different steels. A specific part of the text deals with a ultra high tensile strength pre-coated boron steel for hot forming. In addition to this, the crash resistance is investigated by using a dynamic axial compression test and a dynamic three point bending test on structural components with closed and open cross sections. For each steel grade, the estimated weight saving potential is compared with respect to parts manufactured in high drawability steel. Finally, two different designs are presented with steel solutions for safety parts. The first one shows the advantage of the use of TRIP steel and a hydroforming technique for a crash box instead of using a conventional forming technique. The second one deals with the design of a cross frontal sill with a complex cross section, formed using a profile rolling technique.” Cornette at Abstract. “In the automotive industry, significant progress has been made concerning safety, fuel economy, dent resistance and comfort. To achieve these goals, a variety of steels are being used in the vehicles. Lighter cars conform more easily to environmental regulations and to fuel economy. However, safety and comfort considerations involve supplementary equipment and can be in contradiction with the pursuit of lighter weight. In order to contribute to these objectives and to solve these contradictions, formability and high strength requirements of steels increase continuously leading to the development of important new steel grades, and new shapes of safety parts are used.

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	We develop a range of high and ultra high strength steels (TRIP and Boron steels) and work on new design solutions to satisfy some of these requirements. TRIP steels offer an attractive combination of strength and formability, and crash test results show that supplementary progress in safety improvement and lightness can be reached by the use of this high strength steel. The process used for the hot forming of Boron steel permits good formability and very good in-use properties. This ultra high strength steel enables complex parts and the advantages of the pre-coated USIBOR1500 versus the current uncoated boron steels include: no need to remove the oxide layer after hot forming, no decarburization of the steel and corrosion protection of the parts. The combination of high and ultra high strength steels with new forming technique permits improved impact resistance. An example of the use of TRIP steel and hydroforming technique versus a conventional forming technique shows the advantage of this solution in terms of safety. And, a second example gives the interest of a design solution using a profile rolling technique” Cornette at 3. “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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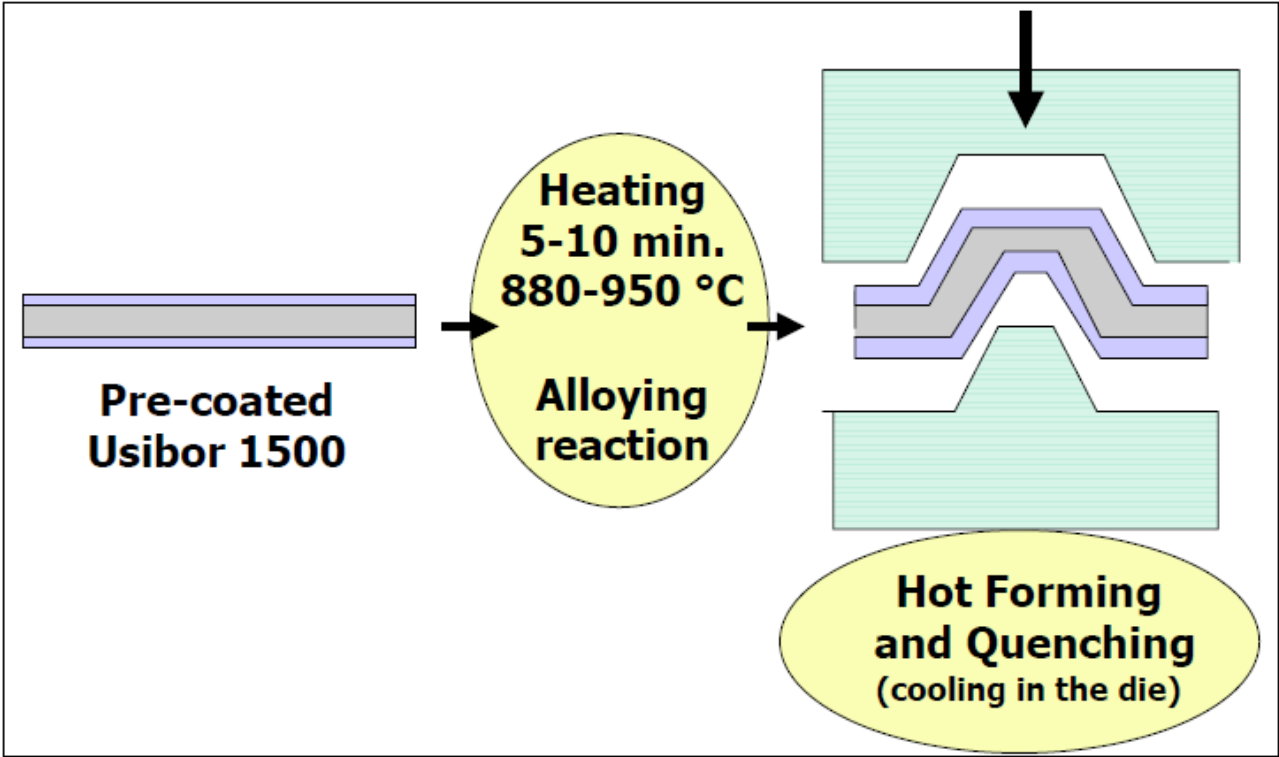
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[1a] a strip of base steel having a first side and a second side; and	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with.

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	Cornette and/or one or more prior art references disclose a strip of base steel having a first side and a second side. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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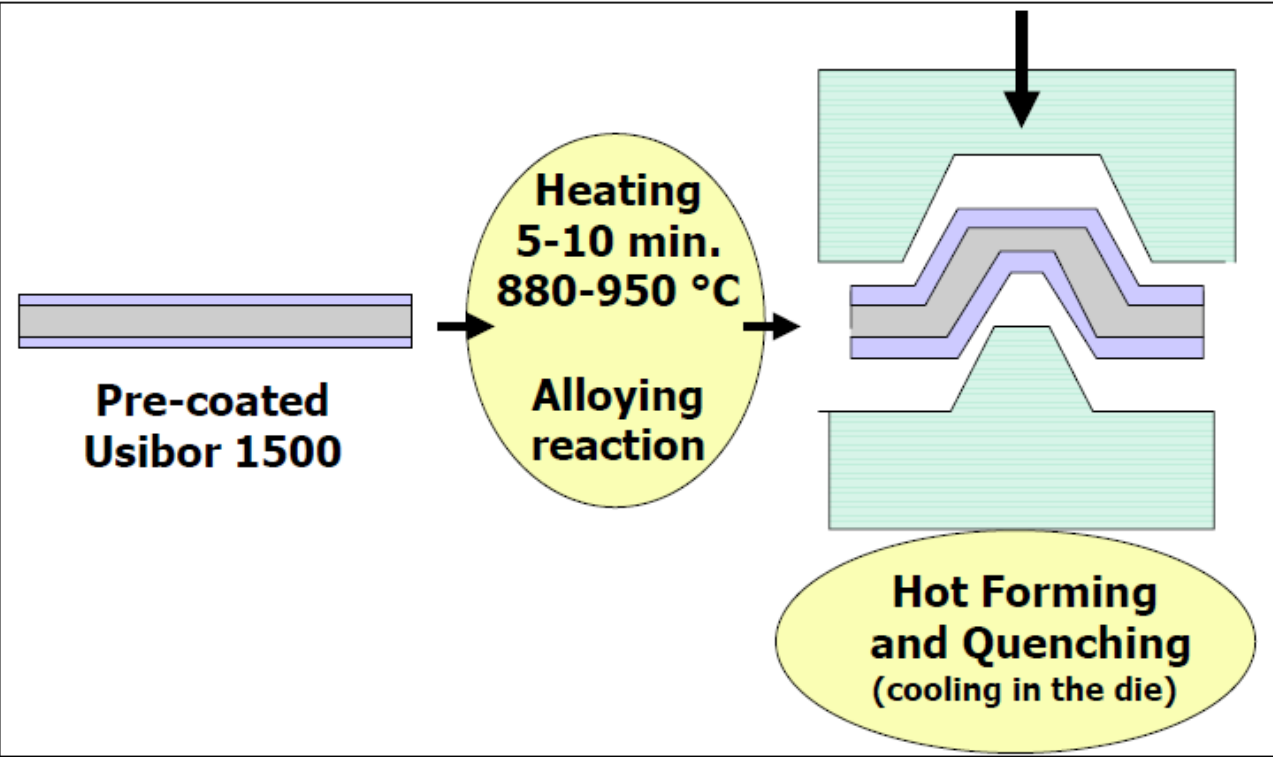
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[1b] a coating on at least one of the first side of the strip of base steel and the second side of the strip of base steel, wherein the	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with.

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coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes, proceeding from the base steel outwards:	Cornette and/or one or more prior art references disclose a coating on at least one of the first side of the strip of base steel and the second side of the strip of base steel, wherein the coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes, proceeding from the base steel outwards. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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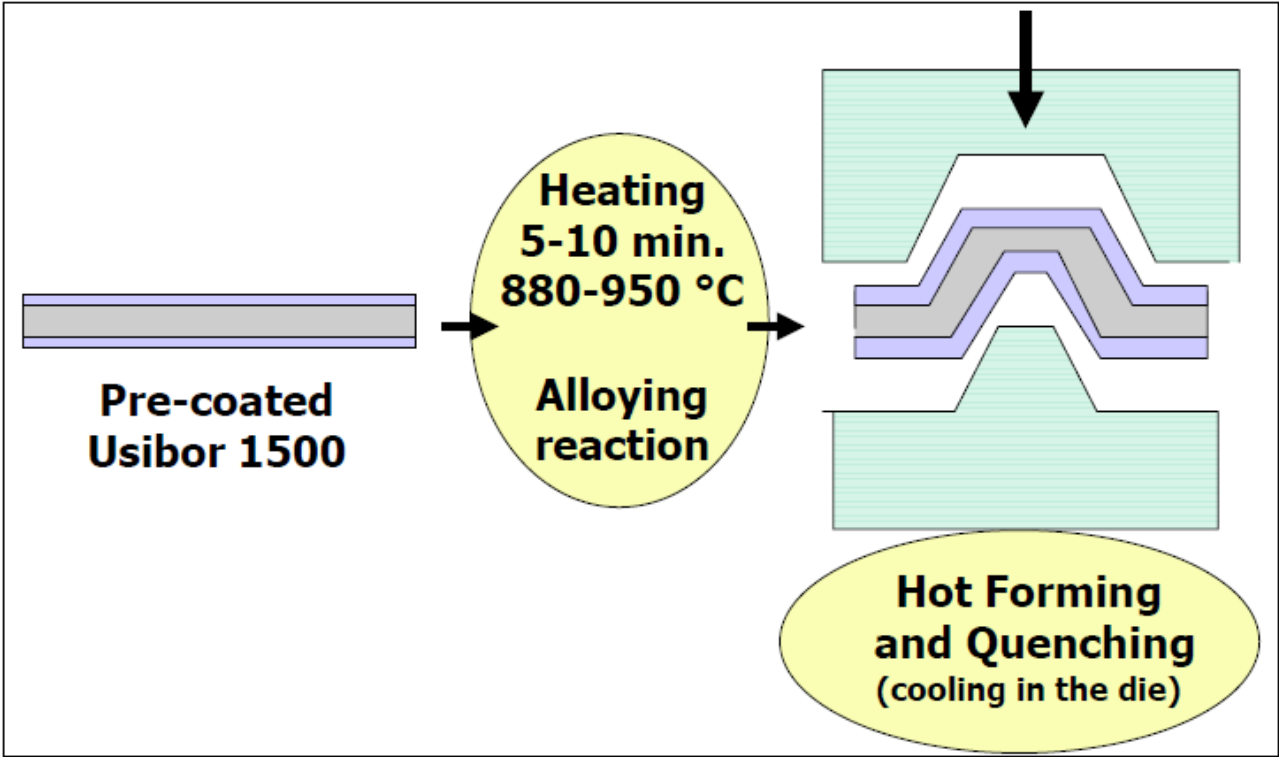
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	 Pre-coated Usibor 1500 Heating 5-10 min. 880-950 °C Alloying reaction Hot Forming and Quenching (cooling in the die) Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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	Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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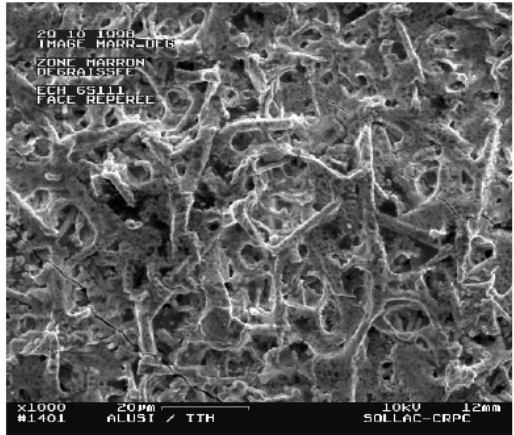
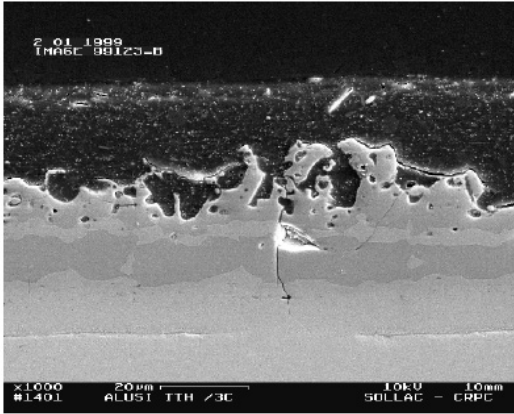
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	 Fig. 22. Section view and coating surface after heat treatment. ” Cornette at 9-10.

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[1c] (a) an interdiffusion layer having a first mean iron composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (a) an interdiffusion layer having a first mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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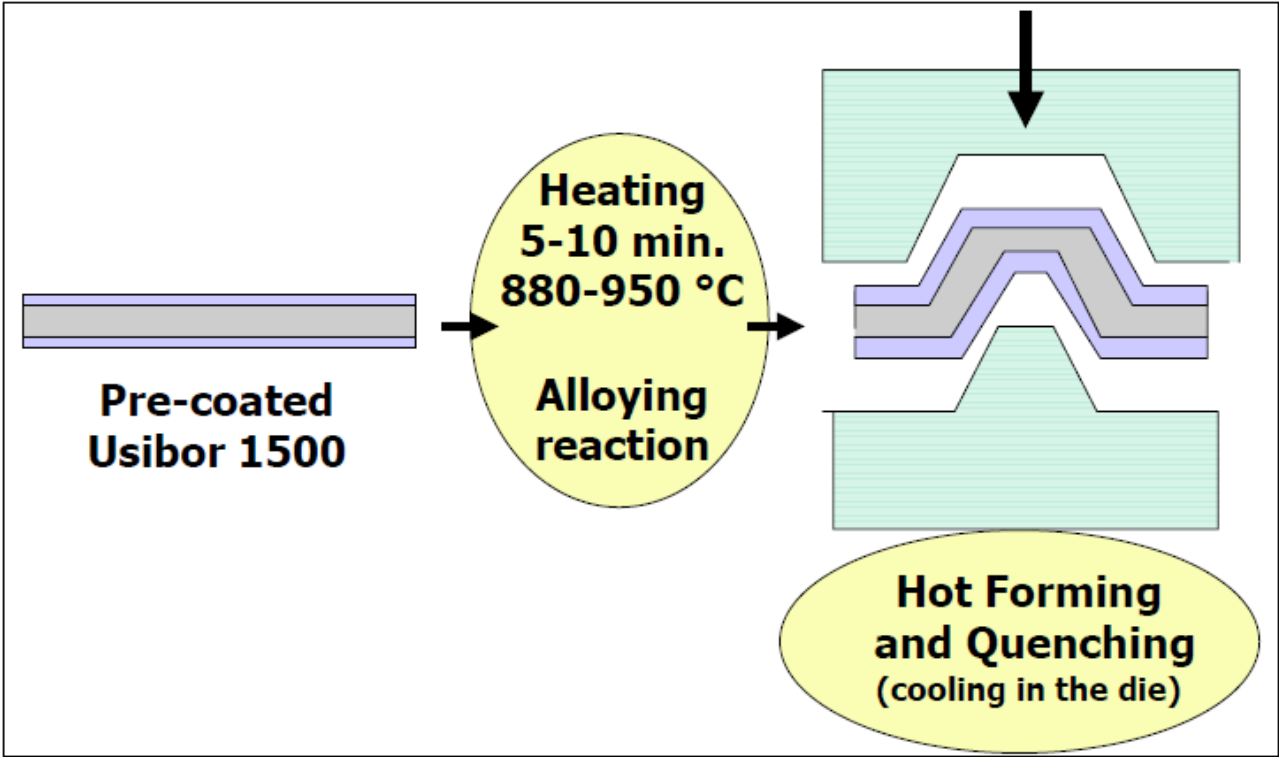
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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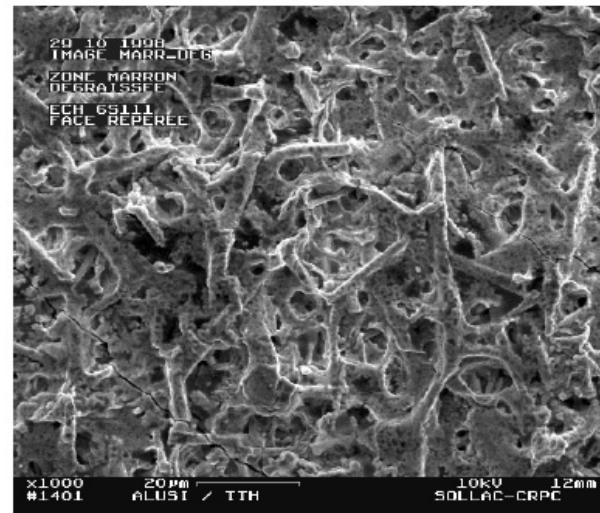
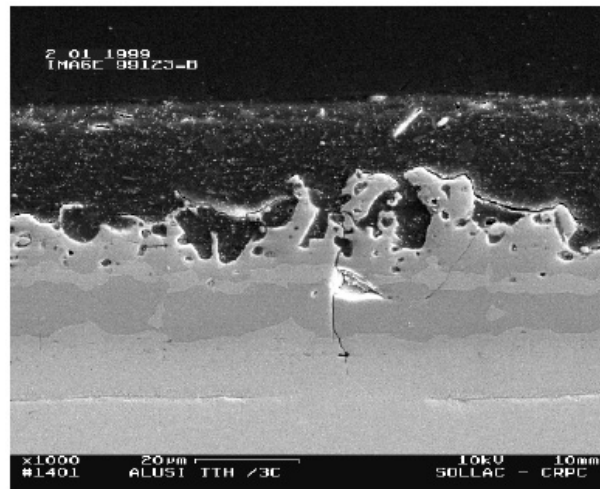


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

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[1d] (b) an intermediate layer having a second mean iron composition different from the first mean iron composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (b) an intermediate layer having a second mean iron composition different from the first mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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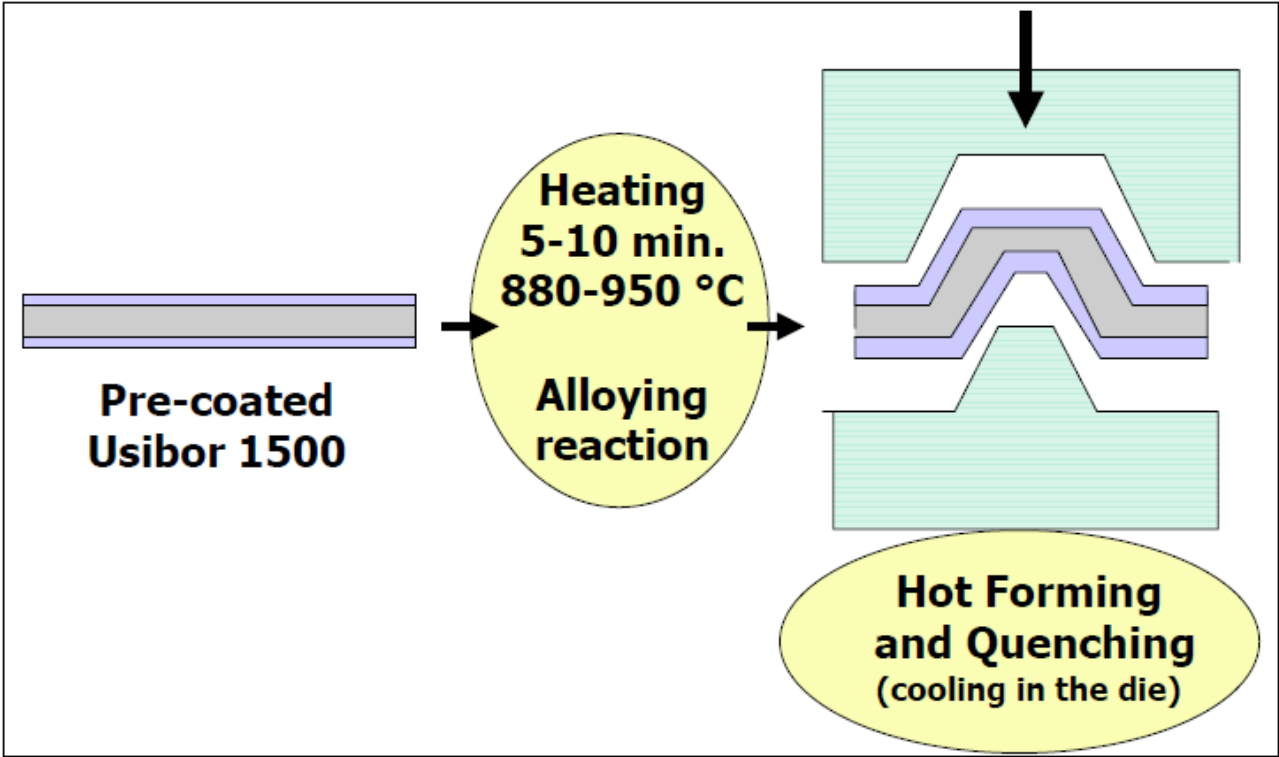
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	 The diagram illustrates the manufacturing process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular strip of material labeled "Pre-coated Usibor 1500". An arrow points from this strip to a yellow oval containing the text "Heating 5-10 min. 880-950 °C" and "Alloying reaction". Another arrow points from this oval to a cross-sectional view of a formed part. This part is shown being pushed into a die by a downward arrow. The die is represented by two green blocks. The formed part has a complex, multi-layered cross-section. Below the die, a yellow oval contains the text "Hot Forming and Quenching (cooling in the die)". Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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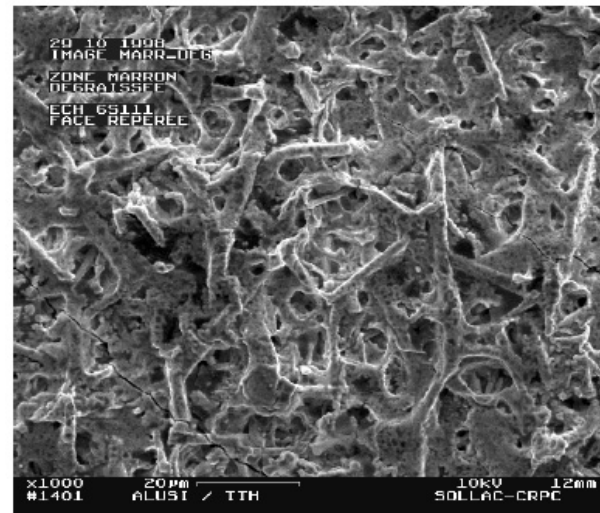
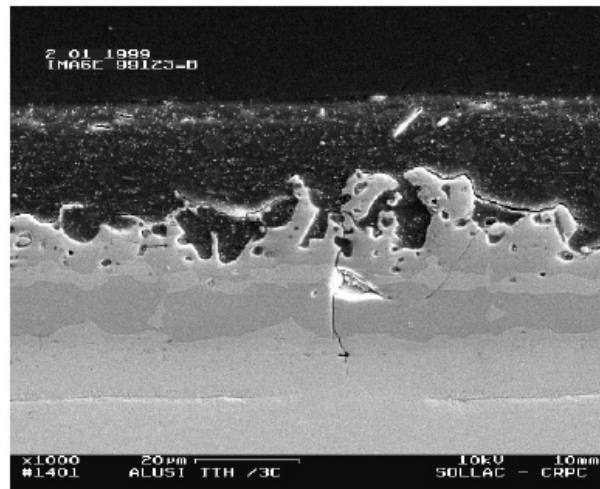


Fig. 22. Section view and coating surface after heat treatment.

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[1e] (c) an intermetallic layer having a third mean iron composition different from the first and second mean iron compositions, the third mean iron composition being higher than the second mean iron composition; and	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (c) an intermetallic layer having a third mean iron composition different from the first and second mean iron compositions, the third mean iron composition being higher than the second mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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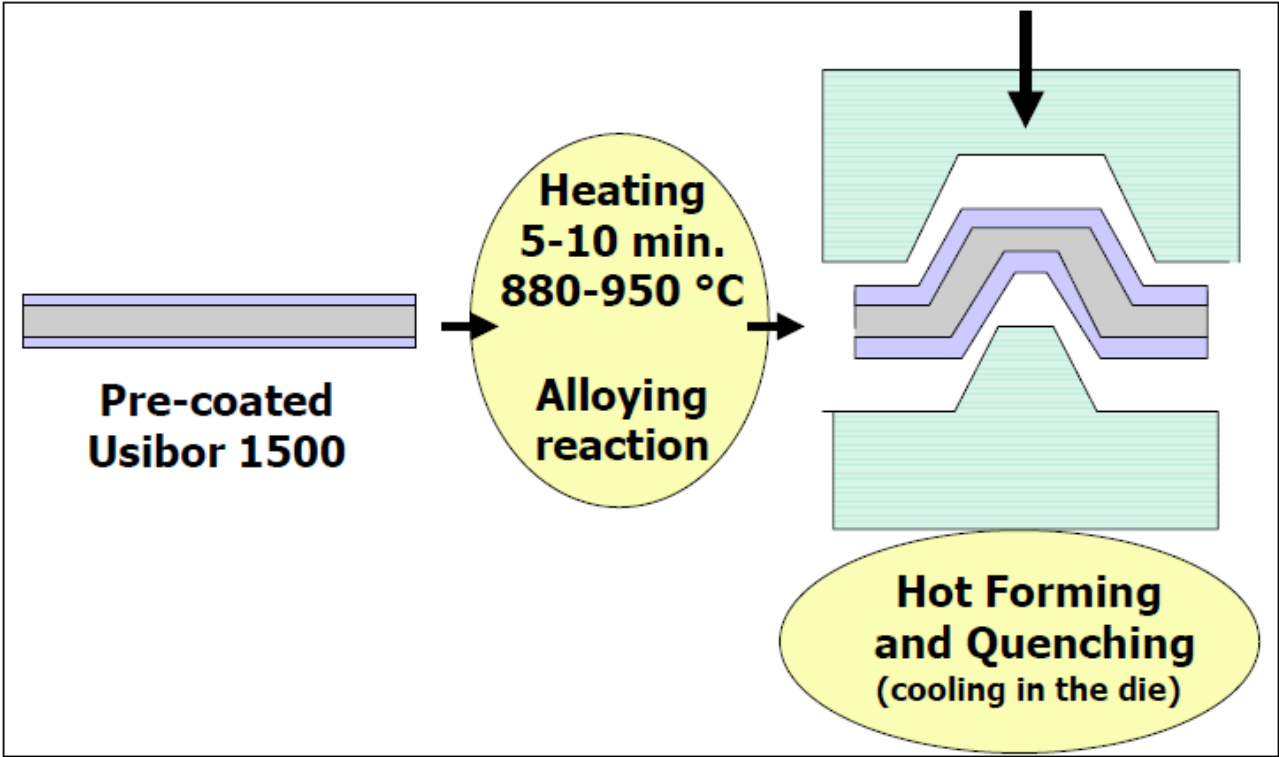
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	 The diagram illustrates the hot forming process for USIBOR 1500 Pre-coated. It begins with a cross-section of a pre-coated steel strip. This strip undergoes a heating process (5-10 min. at 880-950 °C) where an alloying reaction occurs. The heated strip is then formed into a U-shape. Finally, the U-shaped strip is quenched in a die, which is labeled as 'Hot Forming and Quenching (cooling in the die)'. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

EXHIBIT B-14

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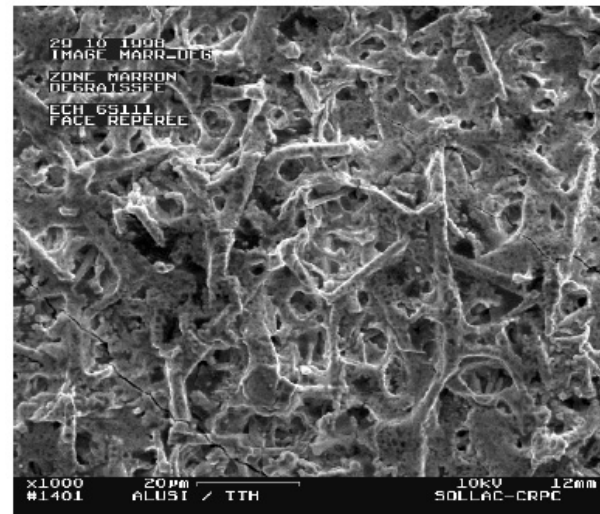
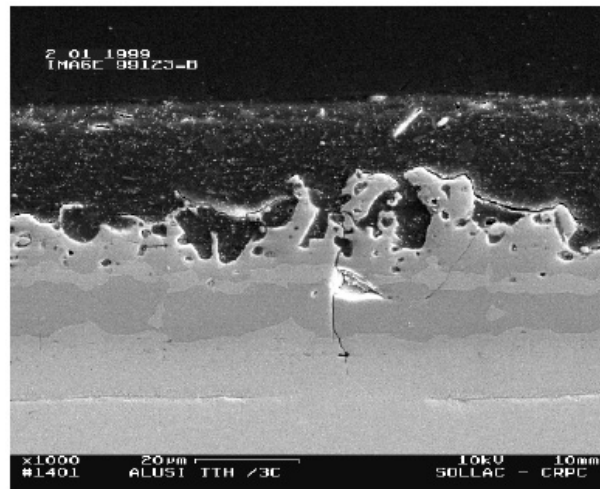


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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[1f] (d) a superficial layer having a fourth mean iron composition different from the third mean iron composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (d) a superficial layer having a fourth mean iron composition different from the third mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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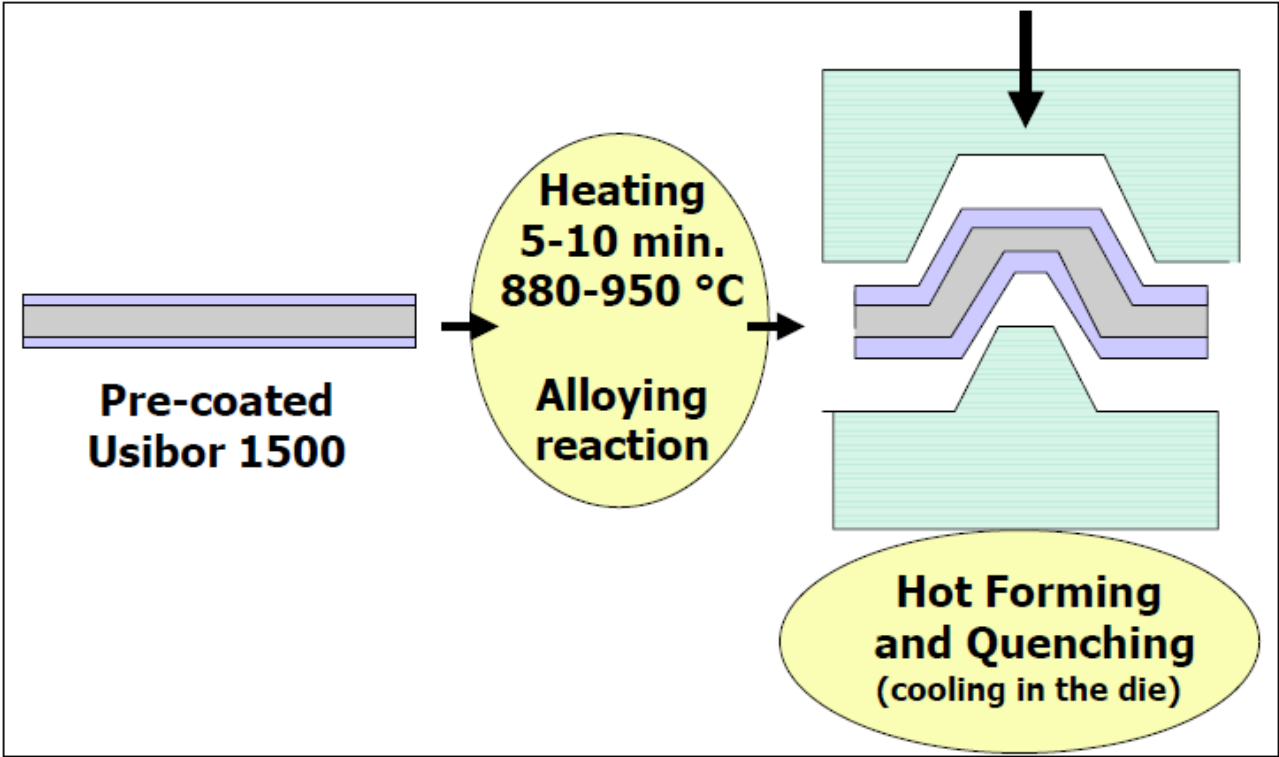
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	 The diagram illustrates the hot forming process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular strip of material labeled "Pre-coated Usibor 1500". An arrow points from this strip to a yellow oval labeled "Heating 5-10 min. 880-950 °C Alloying reaction". Another arrow points from the heating stage to a cross-shaped part being formed in a die. The die is represented by two green rectangular blocks with a cross-shaped cavity. A black arrow points down into the die. The part being formed is shown in cross-section, revealing a layered structure. A yellow oval labeled "Hot Forming and Quenching (cooling in the die)" is positioned below the die, indicating the final step of the process. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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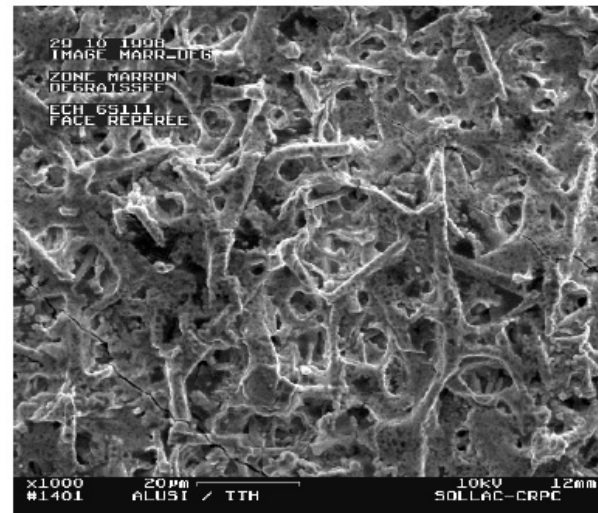
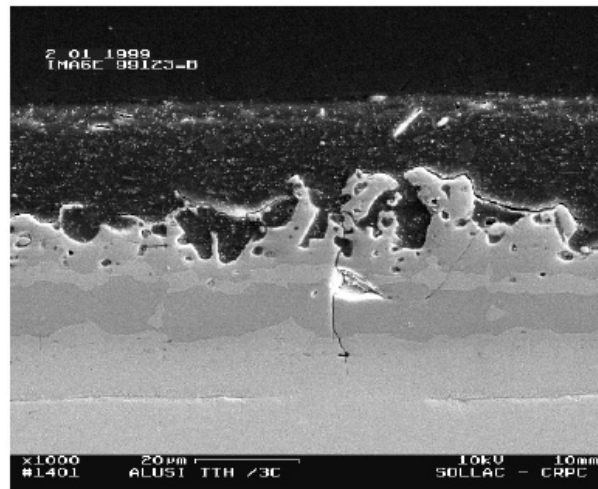


Fig. 22. Section view and coating surface after heat treatment.

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[1g] wherein the coating has a thickness greater than 30 micrometers.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose wherein the coating has a thickness greater than 30 micrometers. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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	The diagram illustrates the hot forming process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular pre-coated sheet. This sheet enters a yellow oval labeled "Heating 5-10 min. 880-950 °C Alloying reaction". After heating, the sheet is formed into a complex, multi-layered shape (resembling a cross or a series of nested chevrons) within a yellow oval labeled "Hot Forming and Quenching (cooling in the die)". A black arrow points down into the forming stage, indicating the direction of material flow or the application of force. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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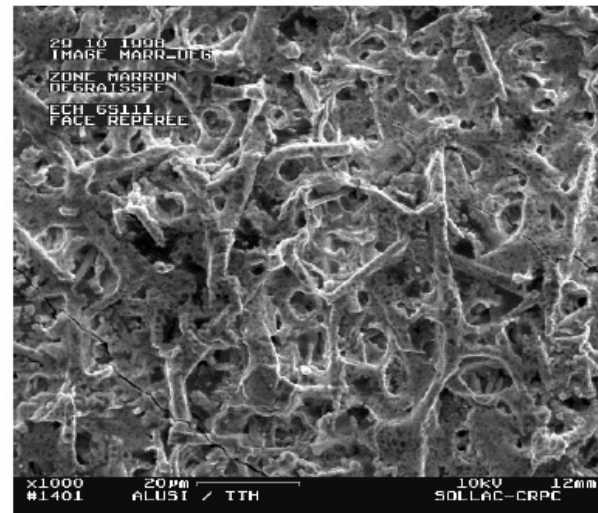
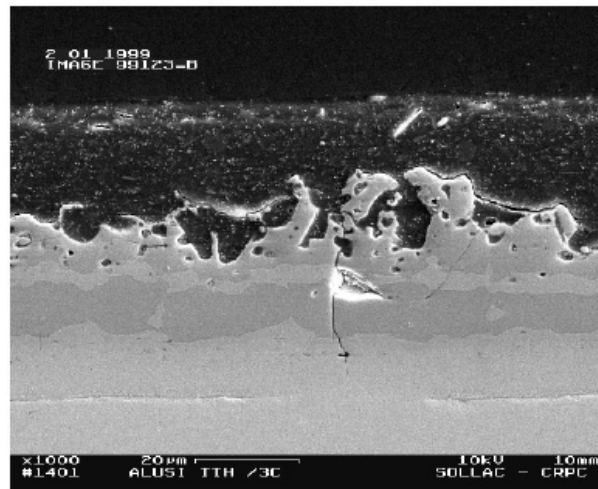


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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Claim 2	
[2] The precoated steel product as recited in claim 1 wherein the layers (c) and (d) are quasi continuous by occupying at least 90% of a level corresponding to each of the layers (c) and (d) and wherein less than 10% of layer (c) is present at an extreme surface of the product.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the layers (c) and (d) are quasi continuous by occupying at least 90% of a level corresponding to each of the layers (c) and (d) and wherein less than 10% of layer (c) is present at an extreme surface of the product. For example: “” Cornette at [XXX]. “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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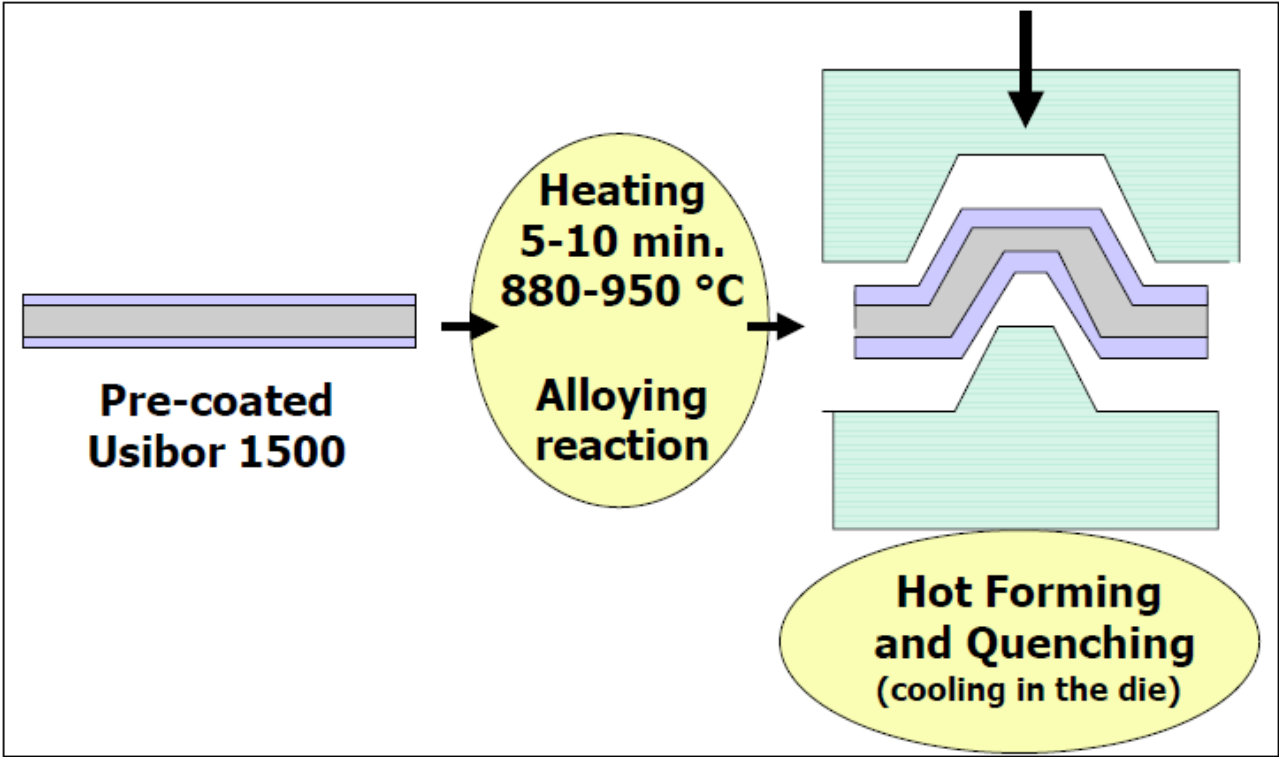
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	 The diagram illustrates the manufacturing process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular strip of material labeled "Pre-coated Usibor 1500". An arrow points from this strip to a yellow oval containing the text "Heating 5-10 min. 880-950 °C" and "Alloying reaction". Another arrow points from this oval to a cross-sectional view of a formed part. This part is shown being pushed into a die by a downward arrow. The die is represented by two light green rectangular blocks. The formed part has a complex, multi-layered cross-section. Below the die, a yellow oval contains the text "Hot Forming and Quenching (cooling in the die)". Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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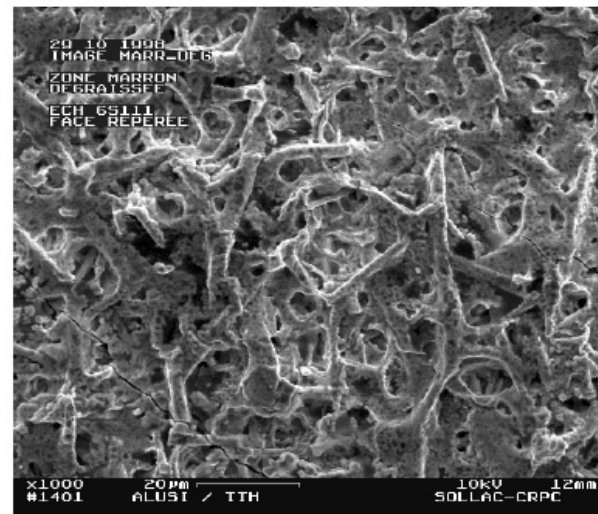
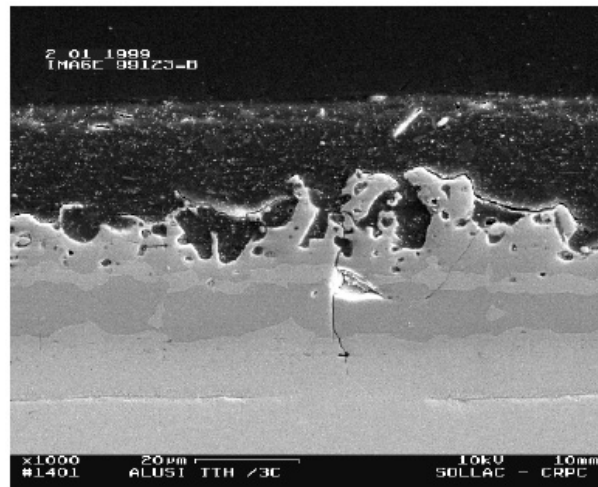


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Claim 3																												
[3] The precoated steel product as recited in claim 1 wherein the base steel includes the following components by weight based on total weight: 0.15%<carbon<0.5%; 0.5%<manganese<3%; 0.1%<silicon<0.5%; 0.01%<chromium<1%; titanium<0.2%; aluminum<0.1%; phosphorus<0.1%; sulfur<0.05%; 0.0005%<boron<0.08%; and further comprises iron and impurities inherent in processing.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the base steel includes the following components by weight based on total weight: 0.15%<carbon<0.5%; 0.5%<manganese<3%; 0.1%<silicon<0.5%; 0.01%<chromium<1%; titanium<0.2%; aluminum<0.1%; phosphorus<0.1%; sulfur<0.05%; 0.0005%<boron<0.08%; and further comprises iron and impurities inherent in processing. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><th></th><th>C</th><th>Mn</th><th>Si</th><th>S</th><th>Cr</th><th>Al</th><th>B</th><th>Ti</th></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process.		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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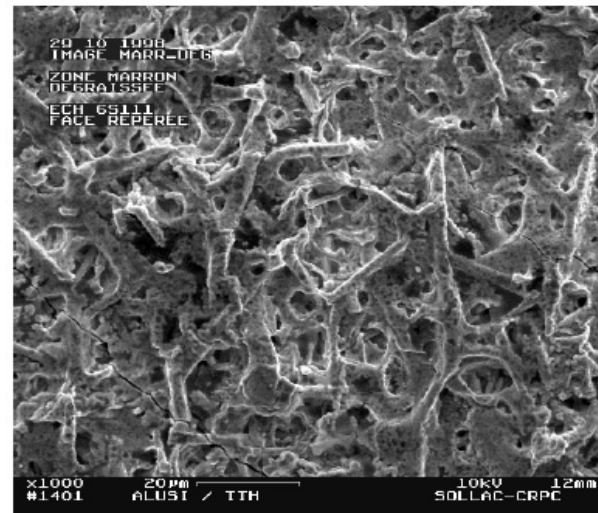
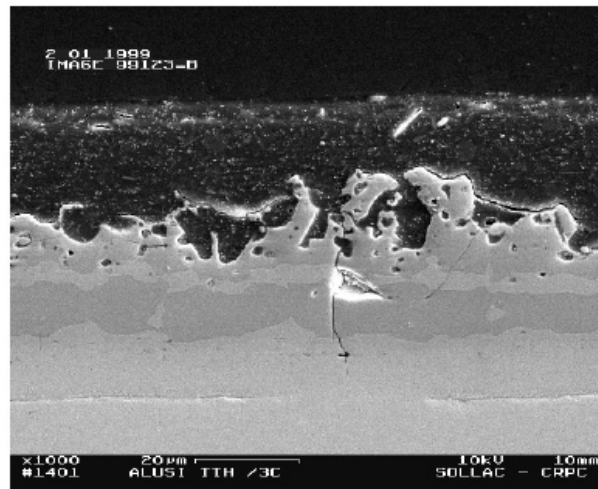


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Claim 4																												
[4] The precoated steel product as recited in claim 1 wherein the base steel comprises the following components by weight based on total weight: 0.20%<carbon<0.5%; 0.8%<manganese<1.5%; 0.1%<silicon<0.35%; 0.01%<chromium<1%; titanium<0.1%; aluminum<0.1%; phosphorus<0.05%; sulfur<0.03%; 0.0005%<boron<0.01%; and further comprises iron and impurities inherent in processing.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the base steel comprises the following components by weight based on total weight: 0.20%<carbon<0.5%; 0.8%<manganese<1.5%; 0.1%<silicon<0.35%; 0.01%<chromium<1%; titanium<0.1%; aluminum<0.1%; phosphorus<0.05%; sulfur<0.03%; 0.0005%<boron<0.01%; and further comprises iron and impurities inherent in processing. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><th></th><th>C</th><th>Mn</th><th>Si</th><th>S</th><th>Cr</th><th>Al</th><th>B</th><th>Ti</th></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process.		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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EXHIBIT B-14

Invalidity of U.S. Patent Nos. 10,961,602 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References

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	The average layer thickness showing the best compromise between corrosion protection and weldability is 25 µm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 µm at the steel surface. The following photo shows a section view of the coating after heat treatment:

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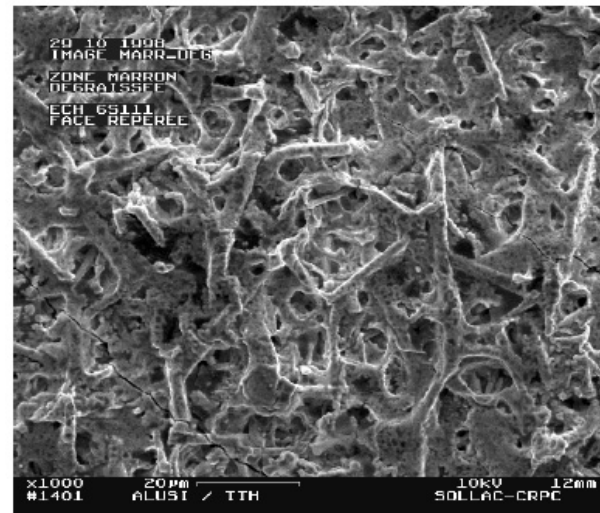
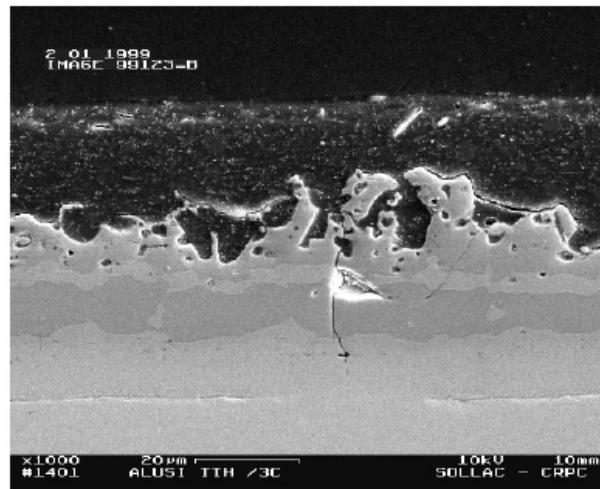


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

EXHIBIT B-14

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Claim 5																												
[5] The precoated steel product as recited in claim 1 wherein the base steel comprises 20 ppm or less of sulfur.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the base steel comprises 20 ppm or less of sulfur. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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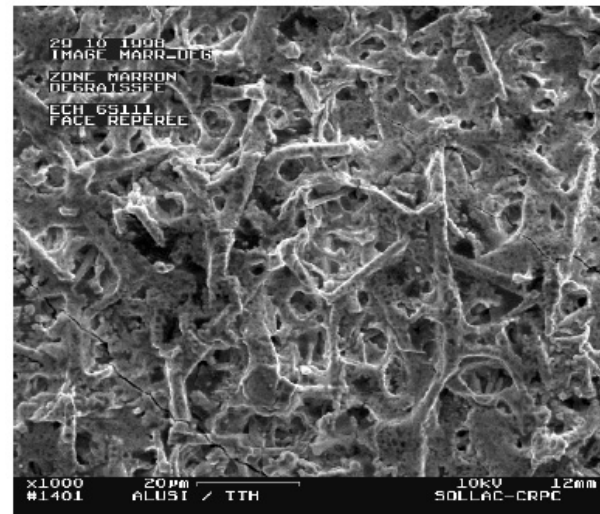
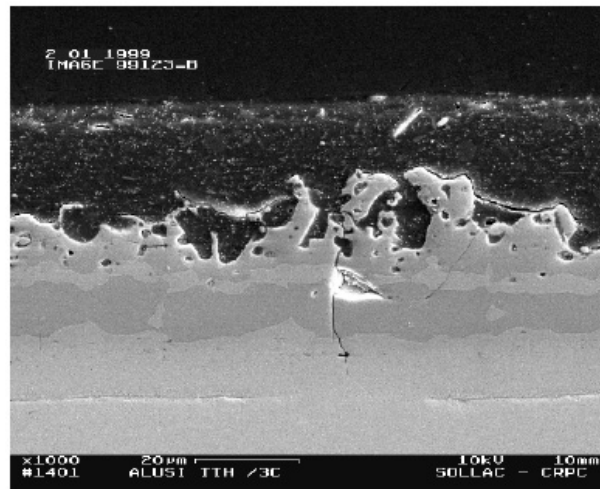


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

EXHIBIT B-14

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Claim 6																												
[6] The precoated steel product as recited in claim 2 wherein the base steel comprises 20 ppm or less of sulfur.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 2 wherein the base steel comprises 20 ppm or less of sulfur. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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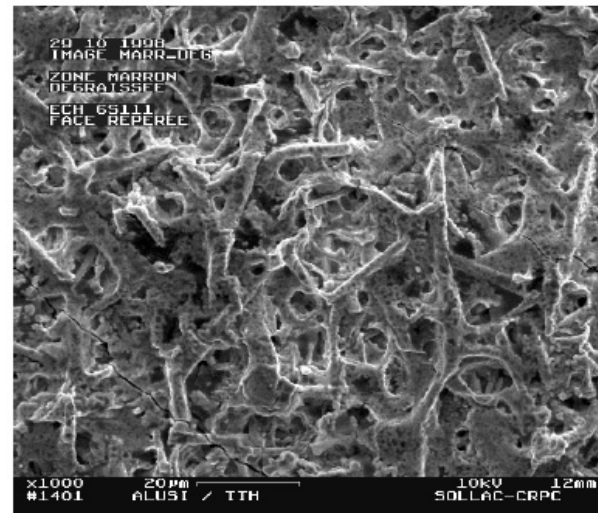
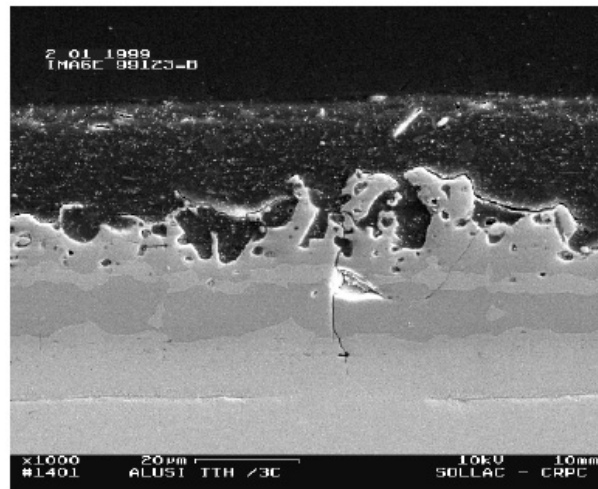


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

EXHIBIT B-14

Invalidity of U.S. Patent Nos. 10,961,602 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References

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Claim 7																												
[7] The precoated steel product as recited in claim 1 wherein a ratio of titanium to nitrogen in the base steel in weight % is in excess of 3.42.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein a ratio of titanium to nitrogen in the base steel in weight % is in excess of 3.42. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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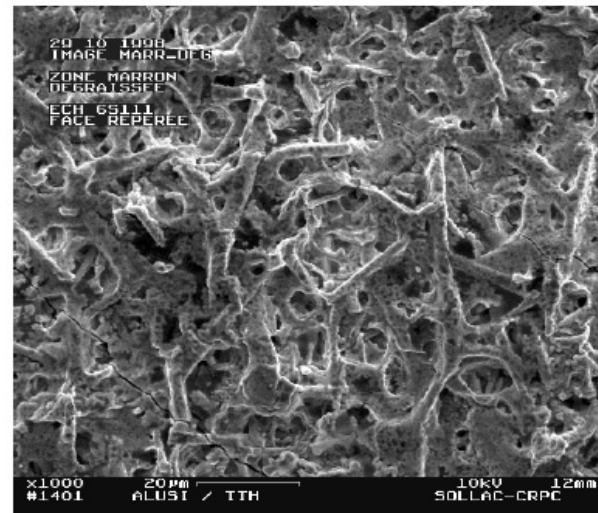
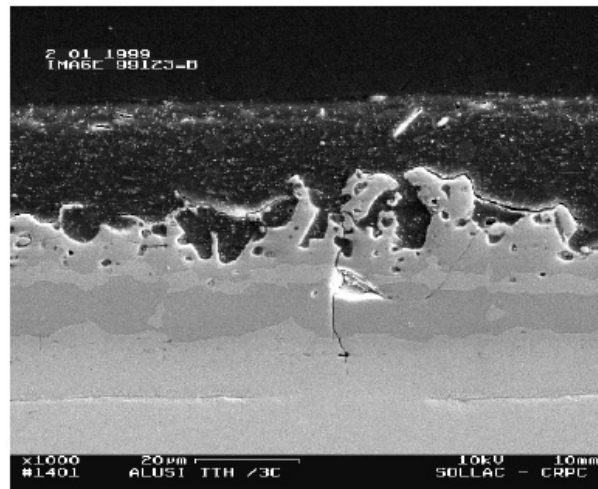


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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Claim 8																												
[8] The precoated steel product as recited in claim 2 wherein a ratio of titanium to nitrogen in the base steel in weight % is in excess of 3.42.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 2 wherein a ratio of titanium to nitrogen in the base steel in weight % is in excess of 3.42. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><th></th><th>C</th><th>Mn</th><th>Si</th><th>S</th><th>Cr</th><th>Al</th><th>B</th><th>Ti</th></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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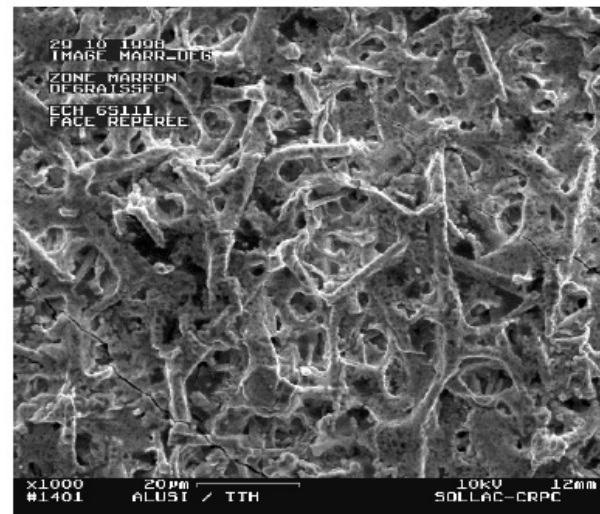
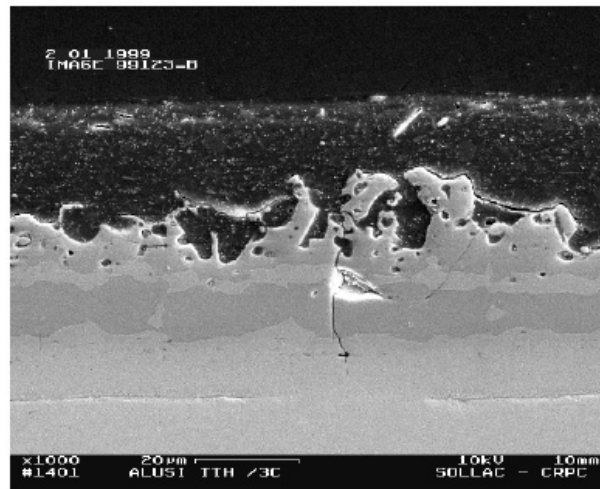


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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Claim 9																												
[9] The precoated steel product as recited in claim 1 wherein the layer (a) has a thickness less than 15 micrometers.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the layer (a) has a thickness less than 15 micrometers. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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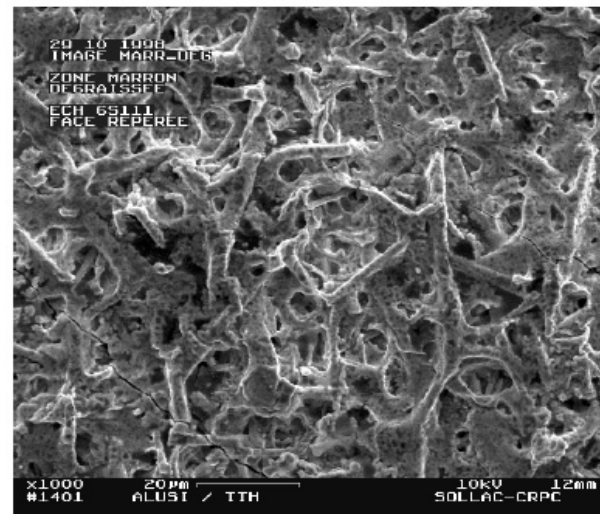
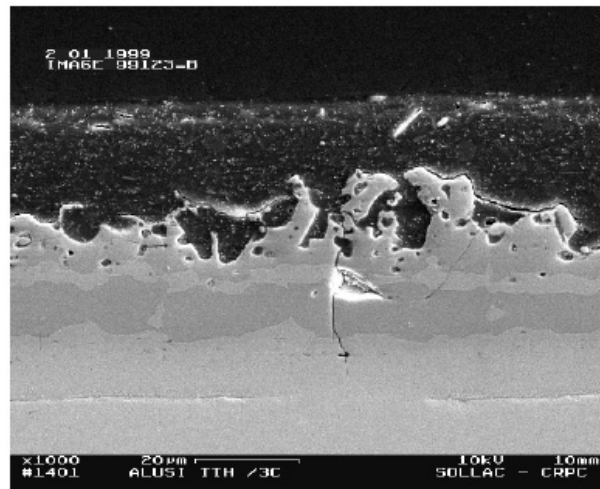


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

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Claim 10																												
[10] The precoated steel product as recited in claim 1 wherein the layer (a) has a thickness less than 10 micrometers.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the layer (a) has a thickness less than 10 micrometers. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 µm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 µm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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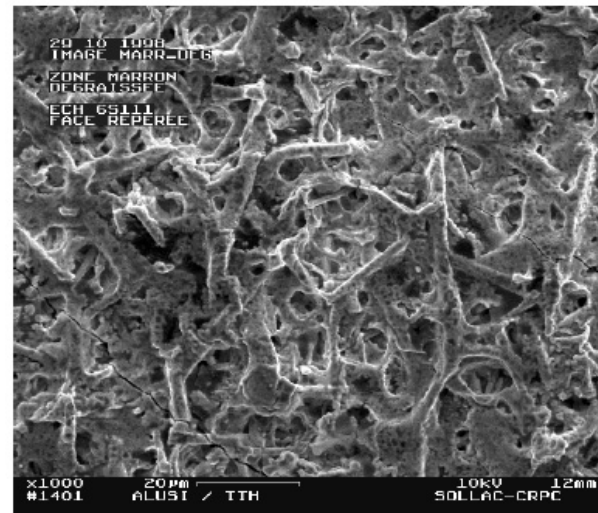
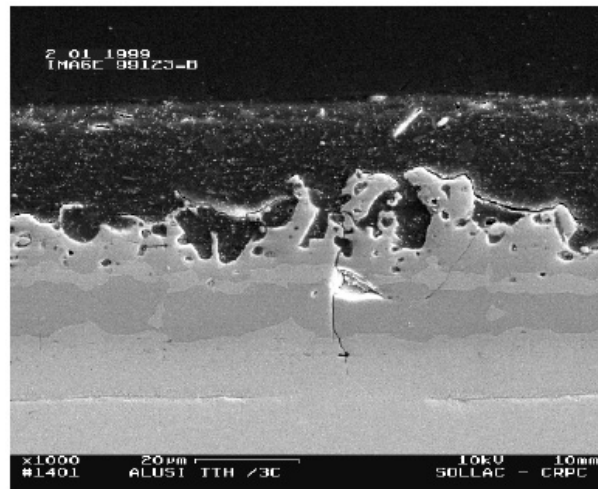


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Claim 12																												
[12] The precoated steel product as recited in claim 1 wherein the intermediate layer comprises the following components by weight based on total weight: 39 to 47% Fe, 53 to 61% Al, and 0 to 2% Si.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the intermediate layer comprises the following components by weight based on total weight: 39 to 47% Fe, 53 to 61% Al, and 0 to 2% Si. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><th></th><th>C</th><th>Mn</th><th>Si</th><th>S</th><th>Cr</th><th>Al</th><th>B</th><th>Ti</th></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 µm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 µm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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Invalidity of U.S. Patent Nos. 10,961,602 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References

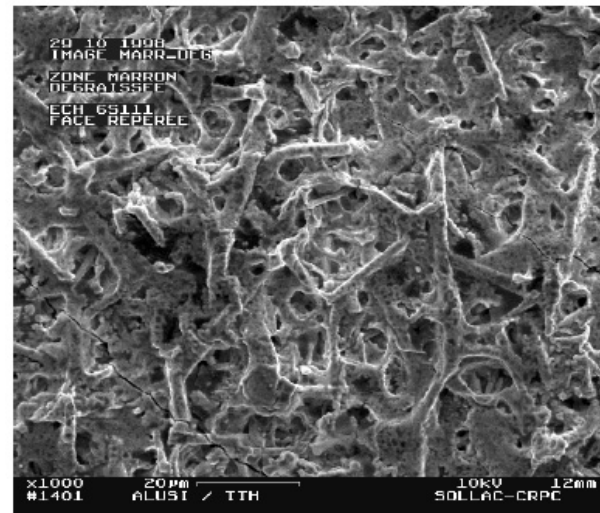
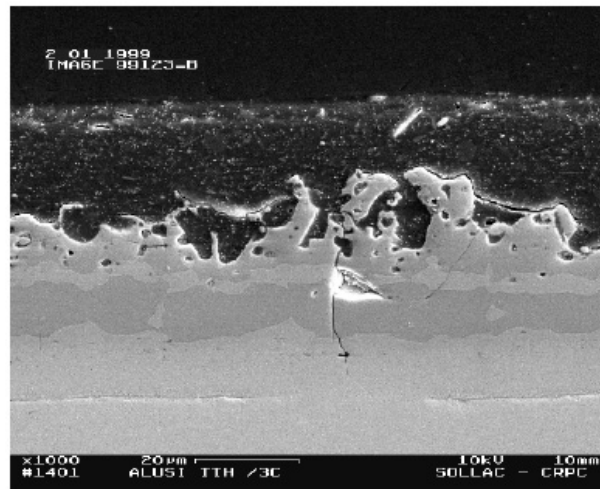


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

EXHIBIT B-14

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'602 Patent	U.S. Patent Nos. 11,326,227 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References																											
Claim 18																												
[18] The pre-coated steel product as recited in claim 1 wherein the interdiffusion layer has a thickness of from 1 micron to 15 microns.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the pre-coated steel product as recited in claim 1 wherein the interdiffusion layer has a thickness of from 1 micron to 15 microns. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 µm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 µm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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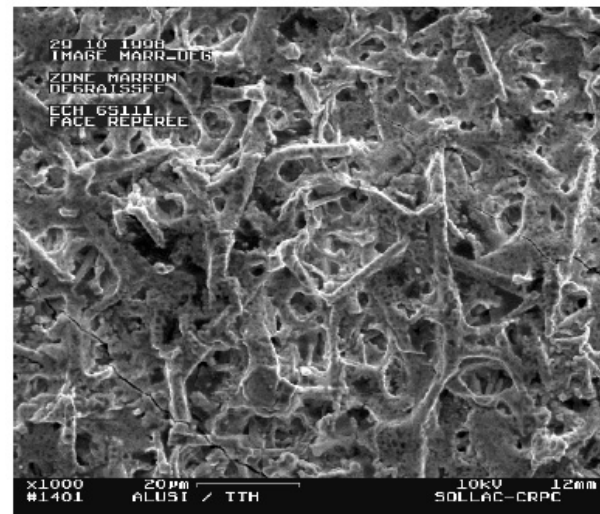
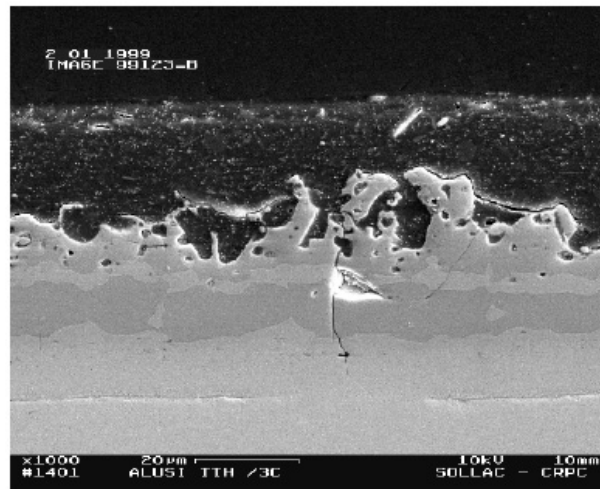


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

EXHIBIT B-14

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Claim 20																												
[20] The pre-coated steel product as recited in claim 1 wherein the fourth mean iron composition is lower than the third mean iron composition.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the pre-coated steel product as recited in claim 1 wherein the fourth mean iron composition is lower than the third mean iron composition. For example: “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9. Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
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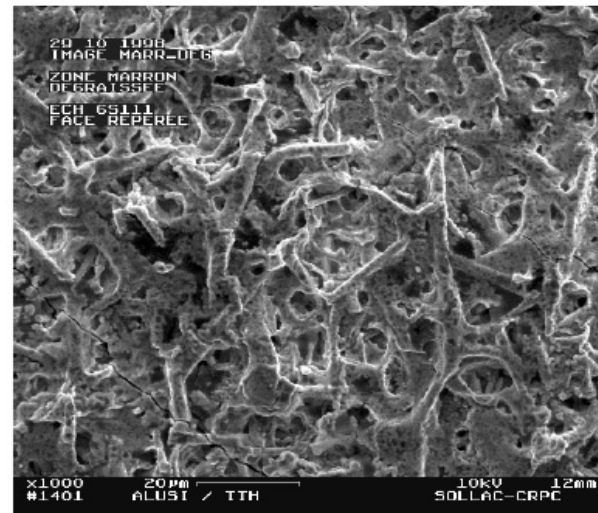
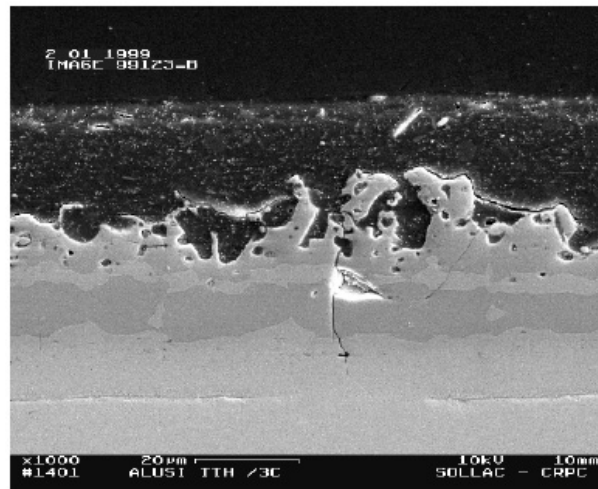


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

EXHIBIT B-14

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Claim 21	
[21pre] A precoated steel product comprising:	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. To the extent the preamble of claim 1 is found to be limiting, Cornette and/or one or more prior art references disclose a precoated steel product comprising. For example: “Energy savings are among the most important goals of steel users. Usinor proposes a wide range of very high strength steels (HSLA, DP, TRIP, etc.) for weight reduction and impact resistance. This text deals with the mechanical testing and different design solutions associated with these steel grades. Tensile and formability properties are presented first by means of basic tests (drawing, stretching, bending, etc.) in order to classify the different steels. A specific part of the text deals with a ultra high tensile strength pre-coated boron steel for hot forming. In addition to this, the crash resistance is investigated by using a dynamic axial compression test and a dynamic three point bending test on structural components with closed and open cross sections. For each steel grade, the estimated weight saving potential is compared with respect to parts manufactured in high drawability steel. Finally, two different designs are presented with steel solutions for safety parts. The first one shows the advantage of the use of TRIP steel and a hydroforming technique for a crash box instead of using a conventional forming technique. The second one deals with the design of a cross frontal sill with a complex cross section, formed using a profile rolling technique.” Cornette at Abstract. “In the automotive industry, significant progress has been made concerning safety, fuel economy, dent resistance and comfort. To achieve these goals, a variety of steels are being used in the vehicles. Lighter cars conform more easily to environmental regulations and to fuel economy. However, safety and comfort considerations involve supplementary equipment and can be in contradiction with the pursuit of lighter weight. In order to contribute to these objectives and to solve these contradictions, formability and high strength requirements of steels increase continuously leading to the development of important new steel grades, and new shapes of safety parts are used.

EXHIBIT B-14

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	We develop a range of high and ultra high strength steels (TRIP and Boron steels) and work on new design solutions to satisfy some of these requirements. TRIP steels offer an attractive combination of strength and formability, and crash test results show that supplementary progress in safety improvement and lightness can be reached by the use of this high strength steel. The process used for the hot forming of Boron steel permits good formability and very good in-use properties. This ultra high strength steel enables complex parts and the advantages of the pre-coated USIBOR1500 versus the current uncoated boron steels include: no need to remove the oxide layer after hot forming, no decarburization of the steel and corrosion protection of the parts. The combination of high and ultra high strength steels with new forming technique permits improved impact resistance. An example of the use of TRIP steel and hydroforming technique versus a conventional forming technique shows the advantage of this solution in terms of safety. And, a second example gives the interest of a design solution using a profile rolling technique” Cornette at 3. “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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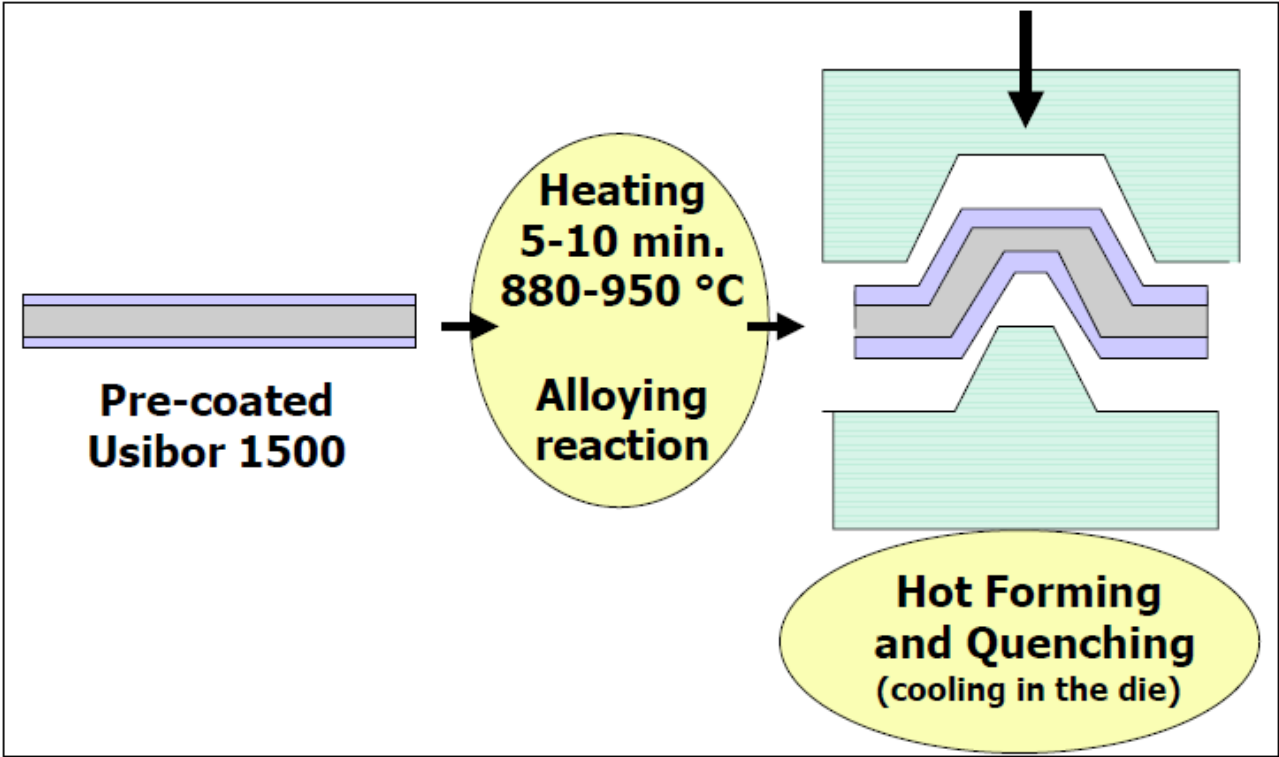
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[21a] a strip of base steel having a first side and a second side; and	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with.

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	Cornette and/or one or more prior art references disclose a strip of base steel having a first side and a second side. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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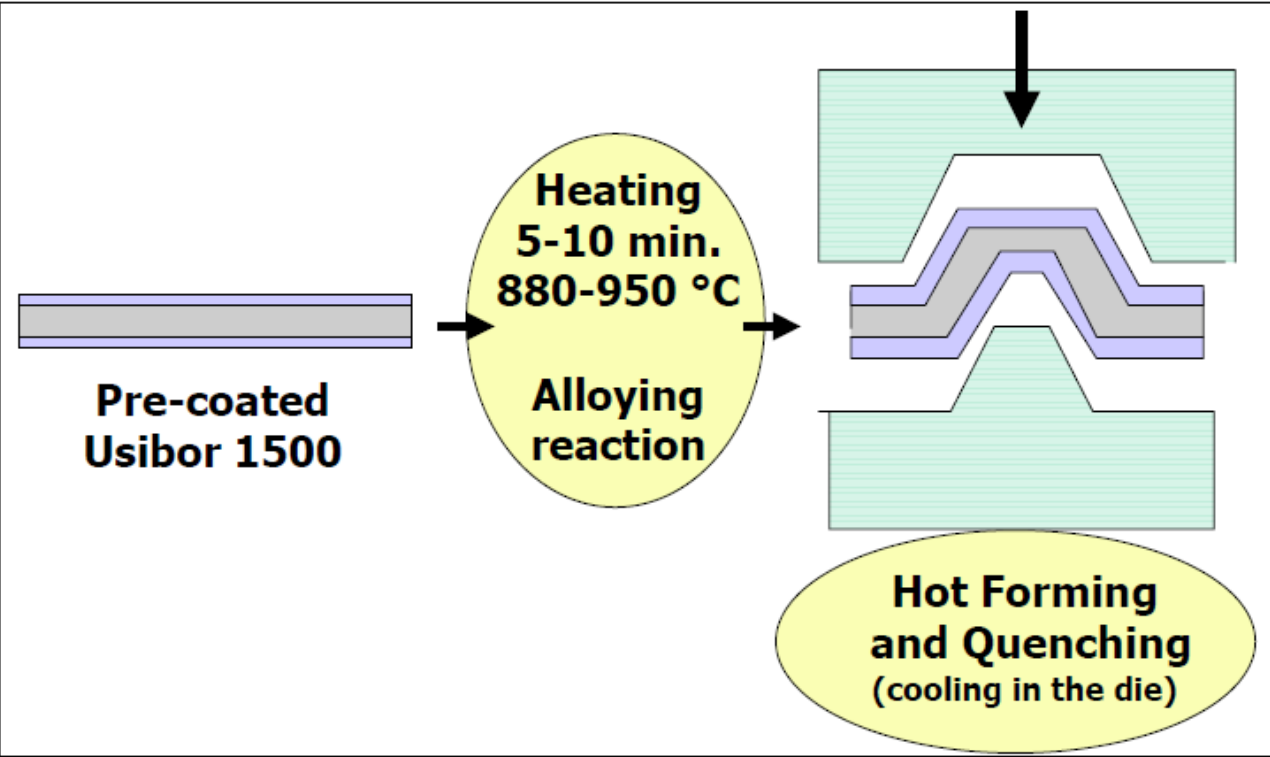
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[21b] a coating on at least one of the first side of the strip of base steel and the second side of the strip of base steel, wherein the	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with.

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coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes, proceeding from the base steel outwards:	Cornette and/or one or more prior art references disclose a coating on at least one of the first side of the strip of base steel and the second side of the strip of base steel, wherein the coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes, proceeding from the base steel outwards. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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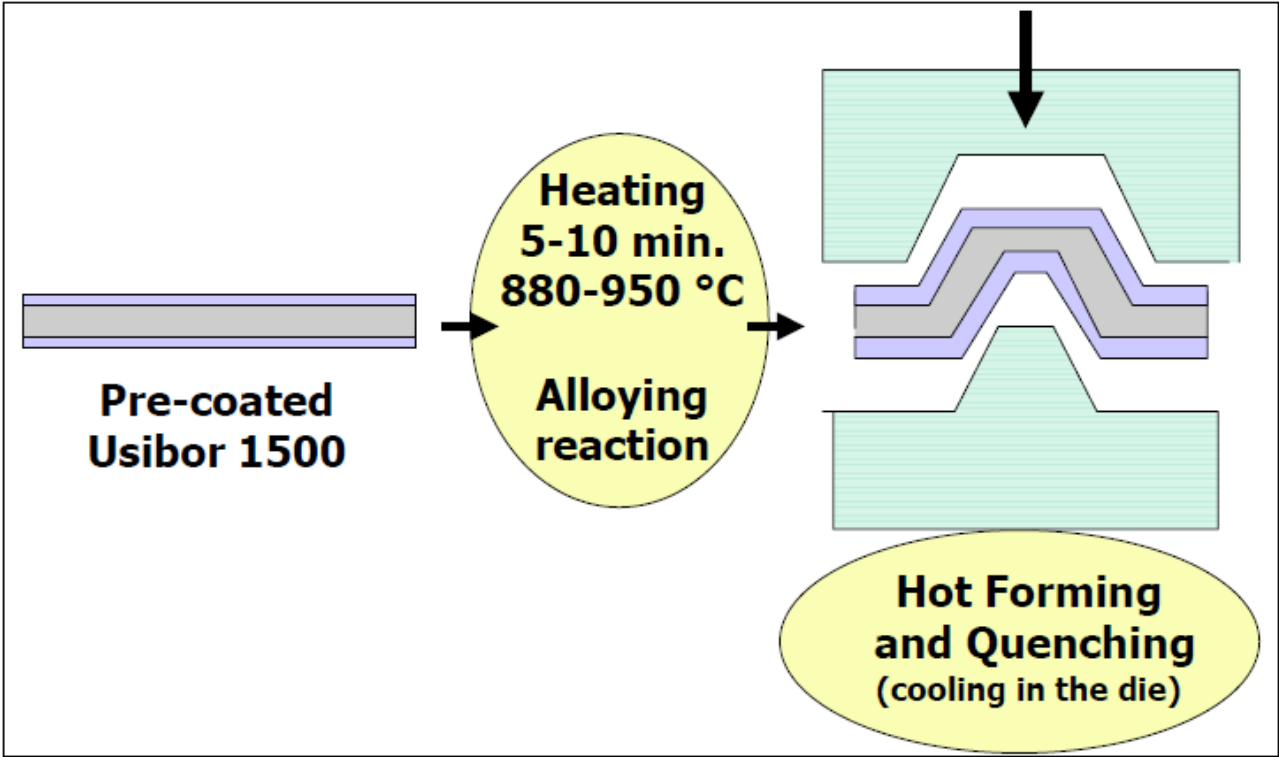
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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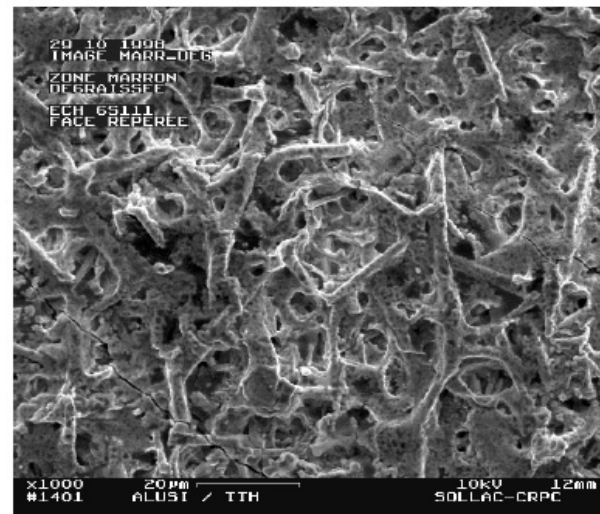
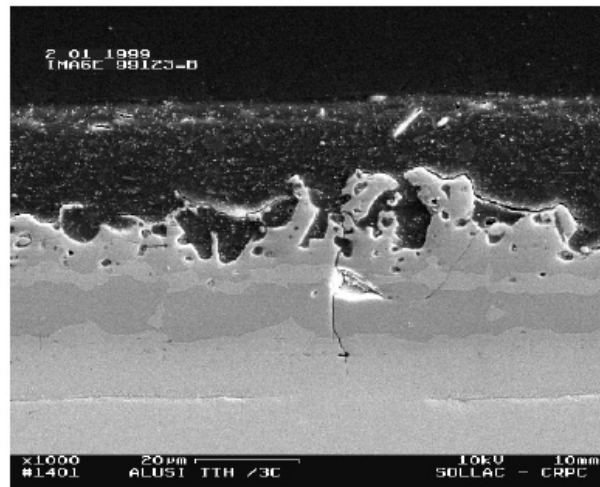


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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[21c] (a) an interdiffusion layer having a first mean iron composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (a) an interdiffusion layer having a first mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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	The diagram illustrates the hot forming process for USIBOR 1500 Pre-coated. It begins with a cross-section of a pre-coated steel strip. This strip enters a die, where it is heated (5-10 min. at 880-950 °C) and then formed into a U-shape. The process is labeled 'Hot Forming and Quenching (cooling in the die)'. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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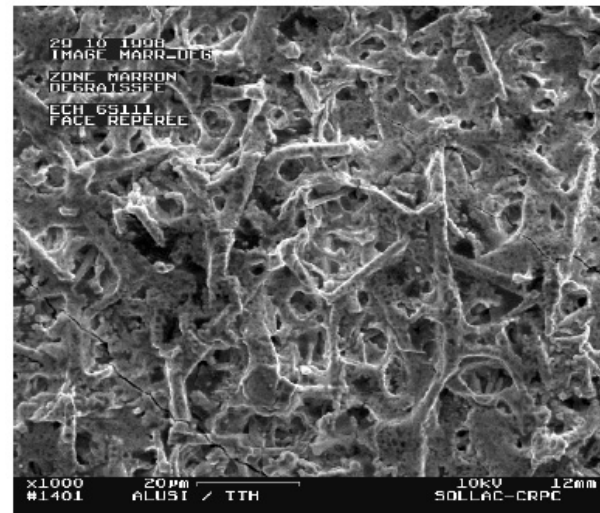
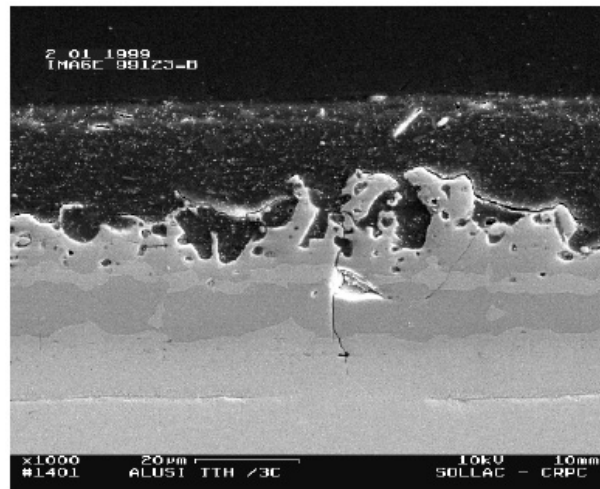


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Cornette at 9-10.

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[21d] (b) an intermediate layer having a second mean iron composition different from the first mean iron composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (b) an intermediate layer having a second mean iron composition different from the first mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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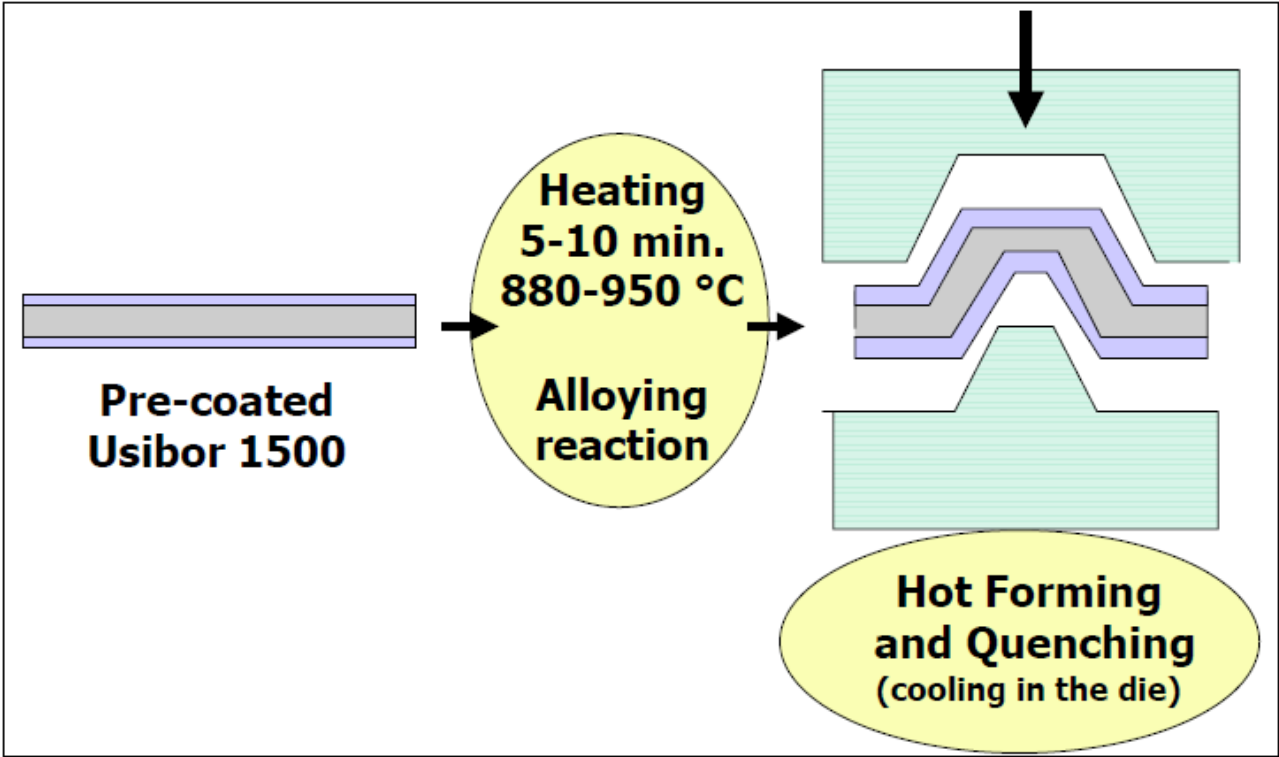
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EXHIBIT B-14

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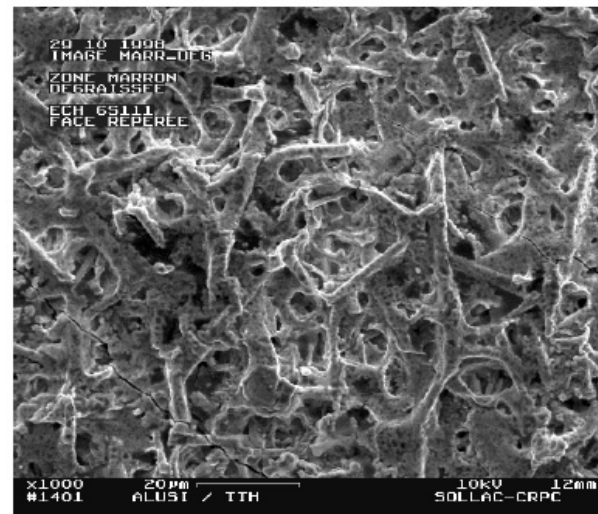
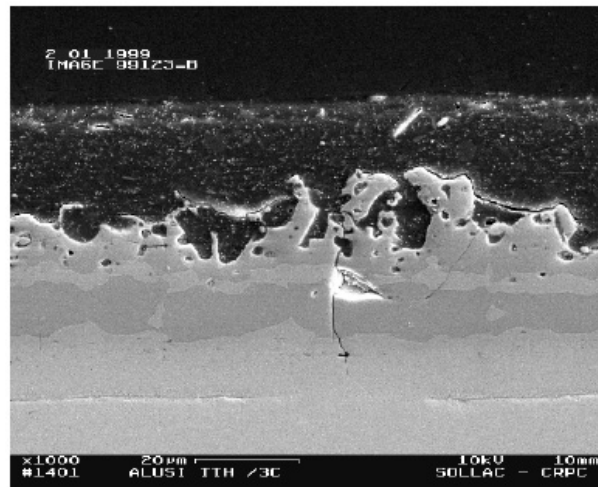


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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[21e] (c) an intermetallic layer having a third mean iron composition different from the first and second mean iron compositions, the third mean iron concentration being higher than the second mean iron composition, and	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (c) an intermetallic layer having a third mean iron composition different from the first and second mean iron compositions, the third mean iron concentration being higher than the second mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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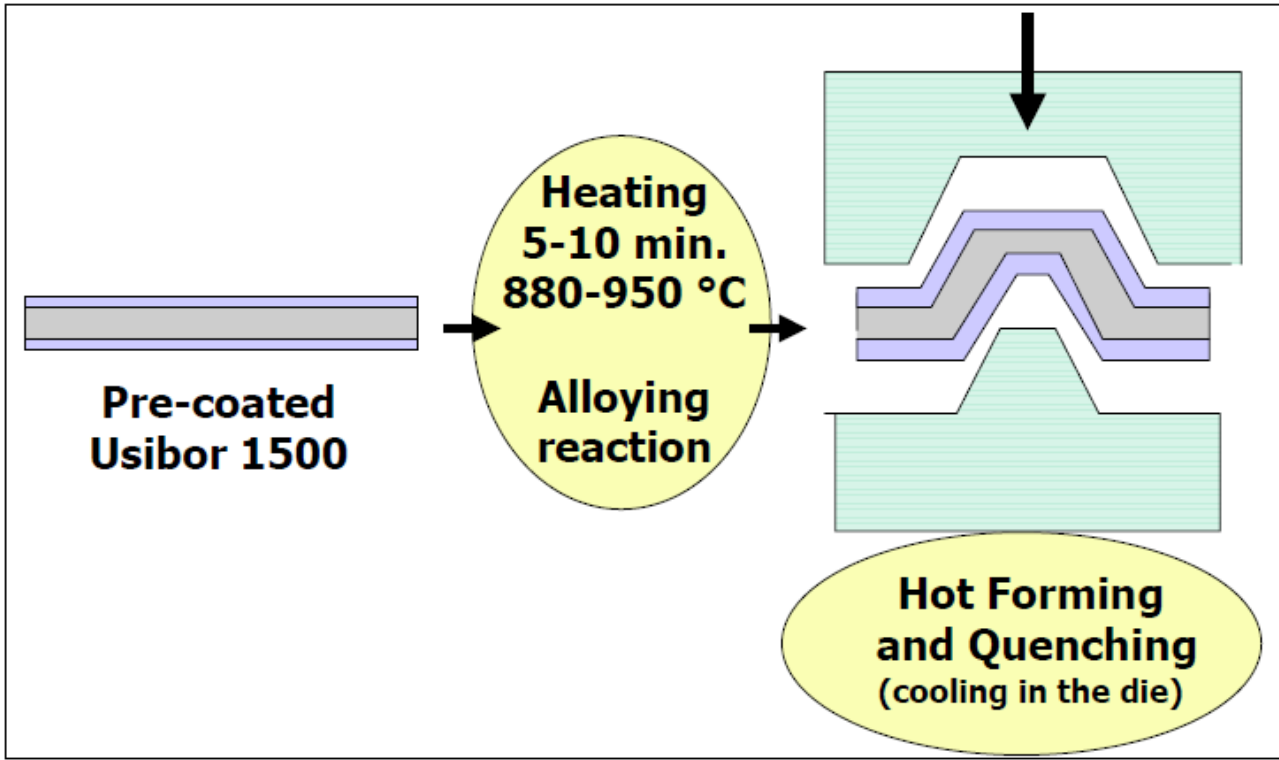
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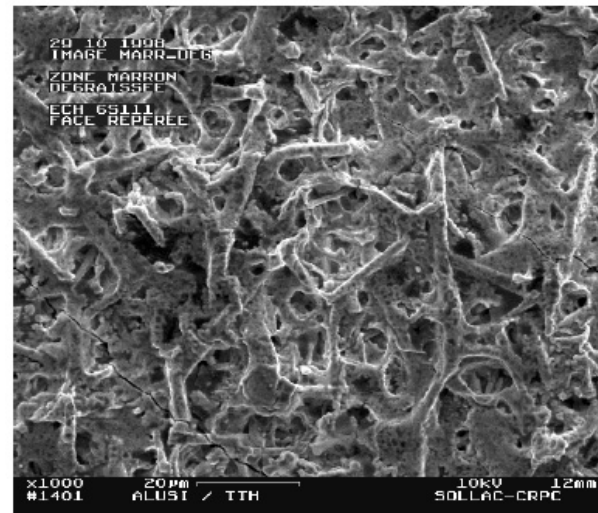
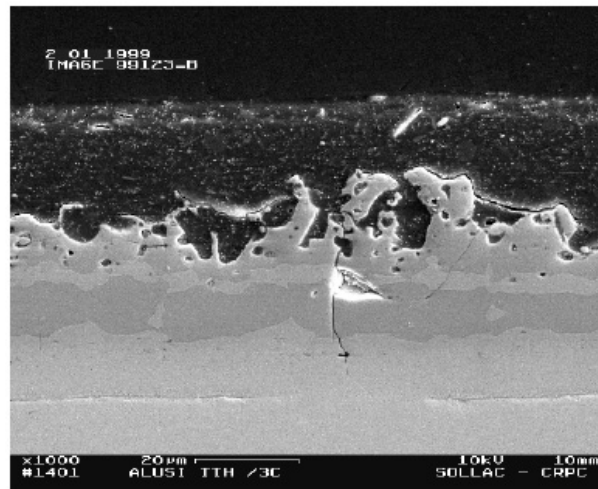


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

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[21f] (d) a superficial layer having a fourth mean iron composition different from the first, second and third mean iron compositions,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (d) a superficial layer having a fourth mean iron composition different from the first, second and third mean iron compositions. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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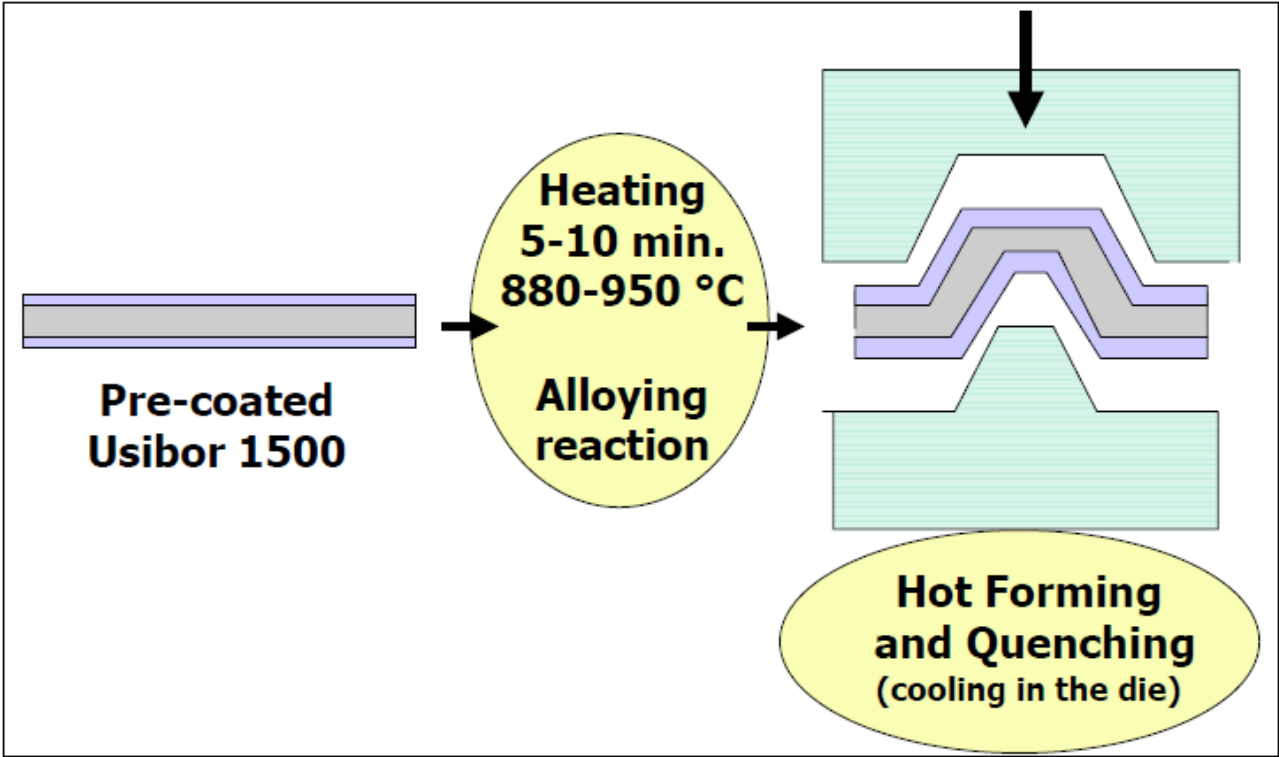
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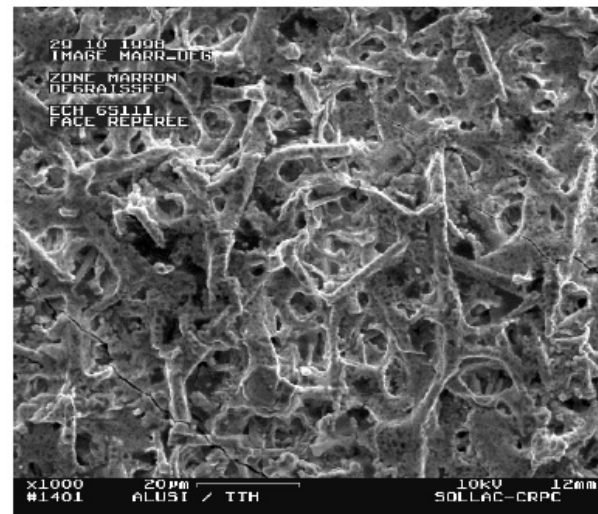
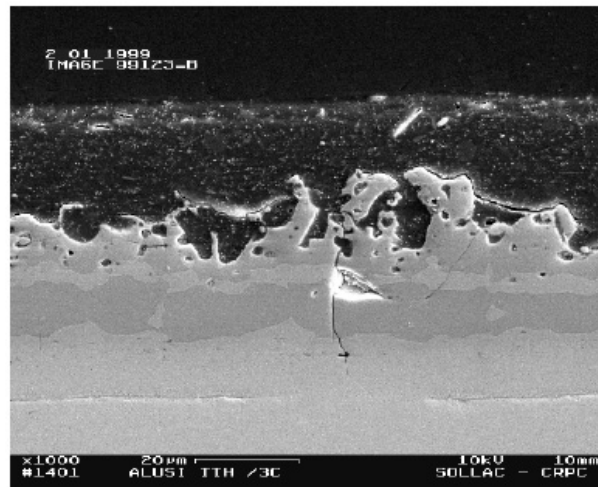


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

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[21g] wherein the coating has a thickness greater than 30 micrometers.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose] wherein the coating has a thickness greater than 30 micrometers. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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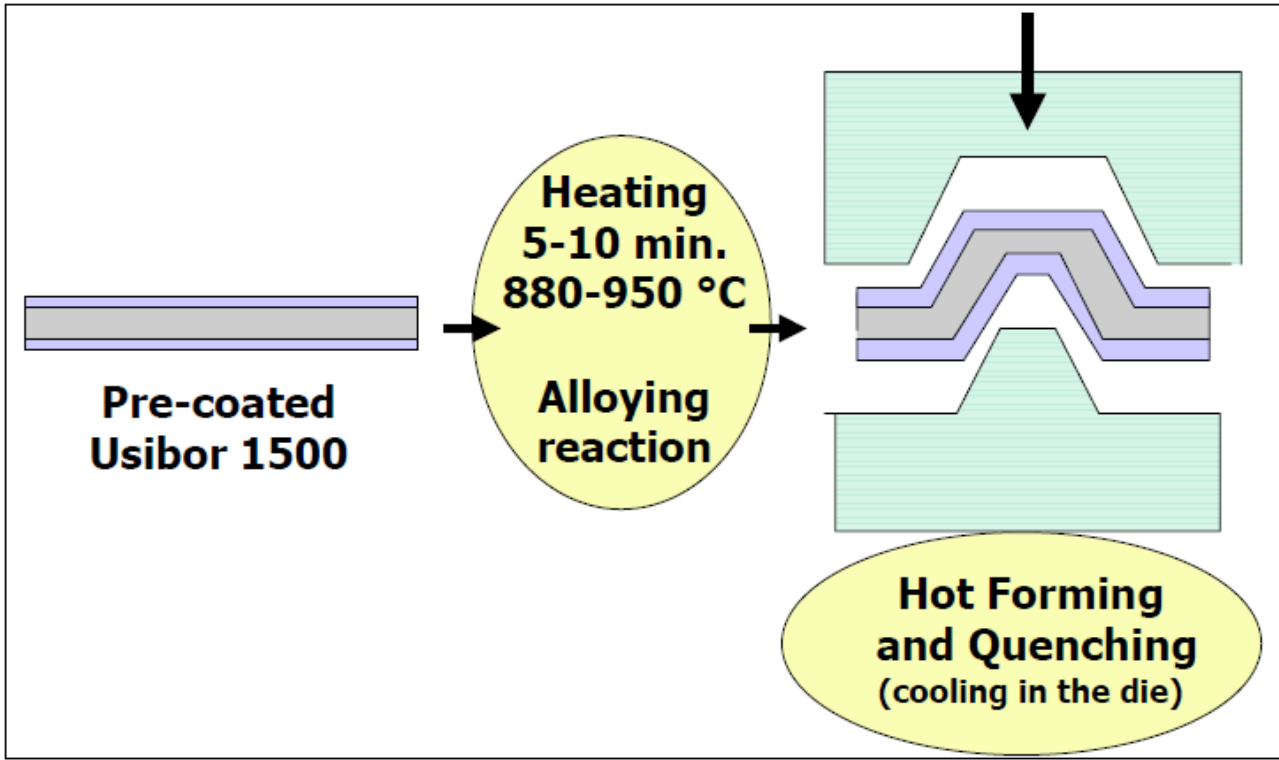
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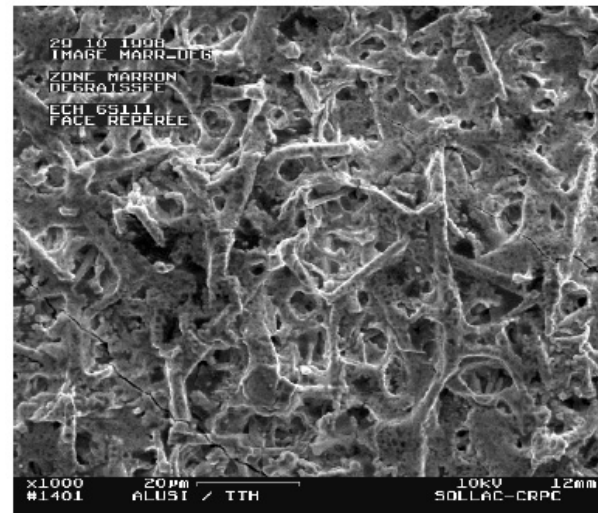
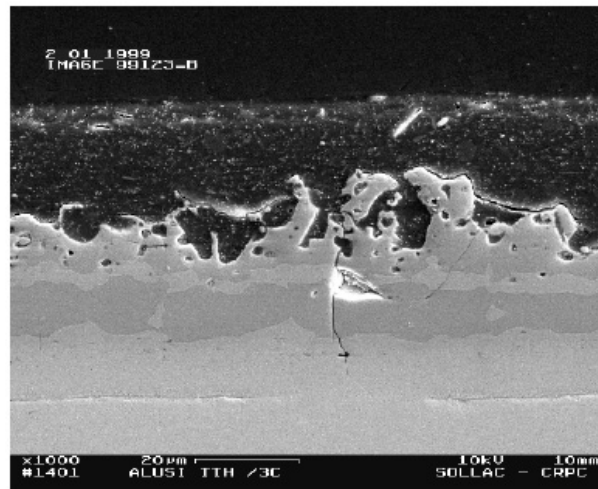


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Claim 22	
[22] The precoated steel product as recited in claim 21 wherein the fourth mean iron composition is lower than the third mean iron composition.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 21 wherein the fourth mean iron composition is lower than the third mean iron composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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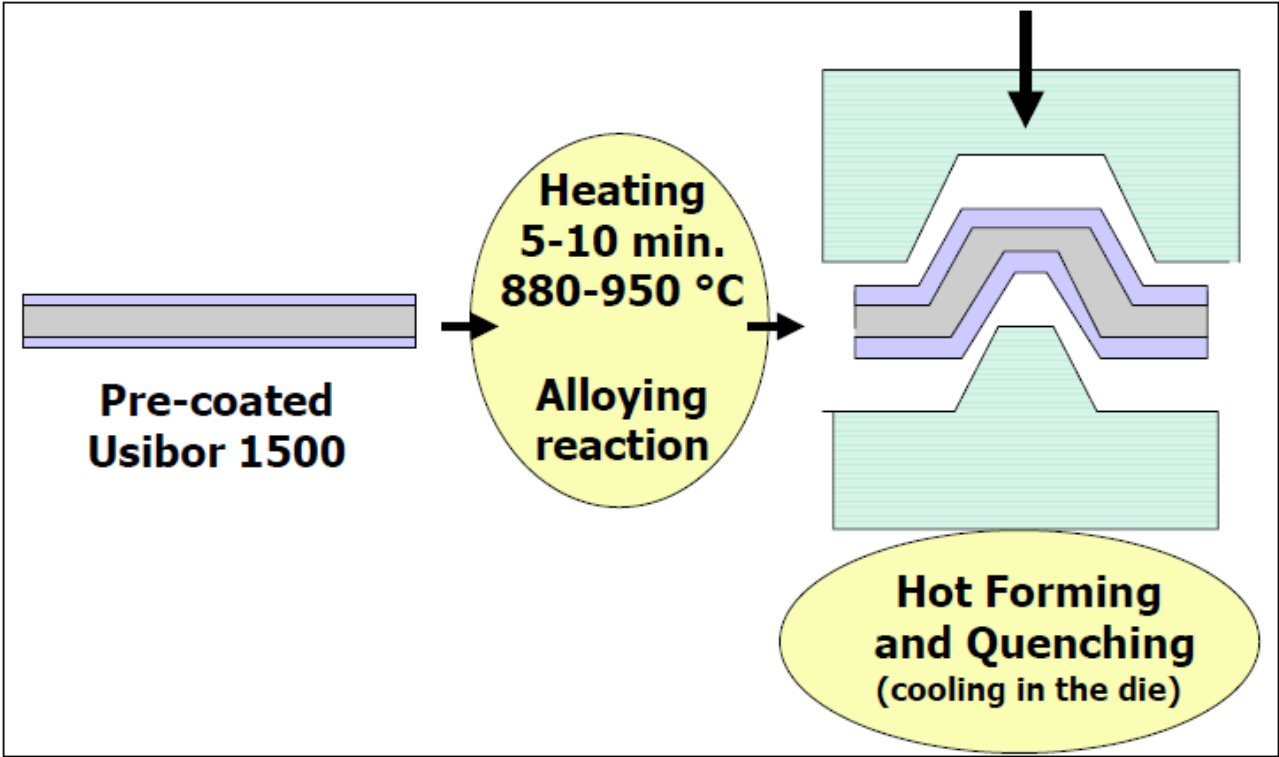
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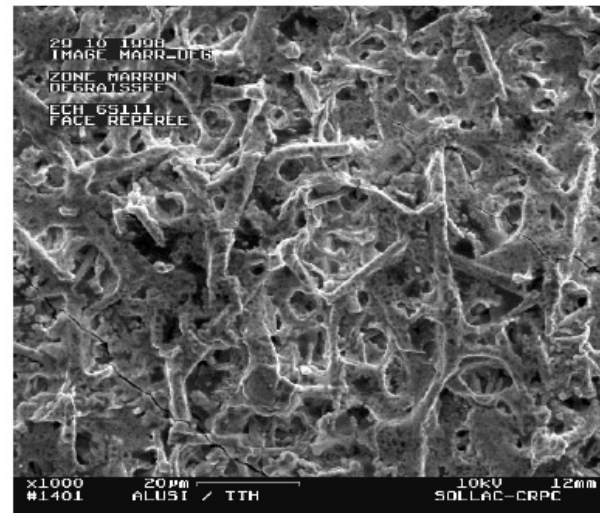
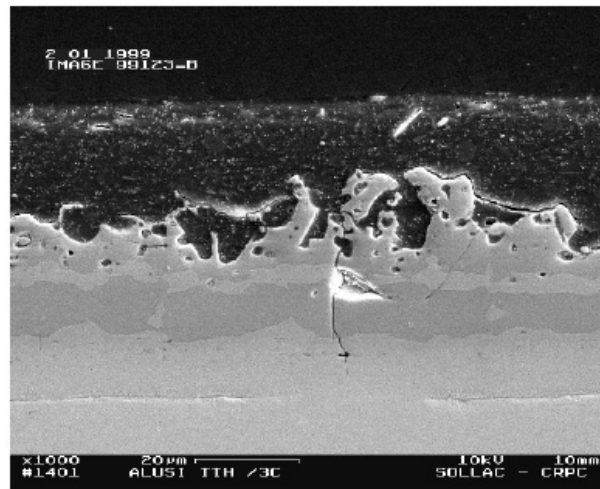


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Cornette at 9-10.

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Claim 24	
[24pre] A precoated steel product comprising:	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. To the extent the preamble of claim 1 is found to be limiting, Cornette and/or one or more prior art references disclose a precoated steel product. For example: “Energy savings are among the most important goals of steel users. Usinor proposes a wide range of very high strength steels (HSLA, DP, TRIP, etc.) for weight reduction and impact resistance. This text deals with the mechanical testing and different design solutions associated with these steel grades. Tensile and formability properties are presented first by means of basic tests (drawing, stretching, bending, etc.) in order to classify the different steels. A specific part of the text deals with a ultra high tensile strength pre-coated boron steel for hot forming. In addition to this, the crash resistance is investigated by using a dynamic axial compression test and a dynamic three point bending test on structural components with closed and open cross sections. For each steel grade, the estimated weight saving potential is compared with respect to parts manufactured in high drawability steel. Finally, two different designs are presented with steel solutions for safety parts. The first one shows the advantage of the use of TRIP steel and a hydroforming technique for a crash box instead of using a conventional forming technique. The second one deals with the design of a cross frontal sill with a complex cross section, formed using a profile rolling technique.” Cornette at Abstract. “In the automotive industry, significant progress has been made concerning safety, fuel economy, dent resistance and comfort. To achieve these goals, a variety of steels are being used in the vehicles. Lighter cars conform more easily to environmental regulations and to fuel economy. However, safety and comfort considerations involve supplementary equipment and can be in contradiction with the pursuit of lighter weight. In order to contribute to these objectives and to solve these contradictions, formability and high strength requirements of steels increase continuously leading to the development of important new steel grades, and new shapes of safety parts are used.

EXHIBIT B-14

Invalidity of U.S. Patent Nos. 10,961,602 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References

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	We develop a range of high and ultra high strength steels (TRIP and Boron steels) and work on new design solutions to satisfy some of these requirements. TRIP steels offer an attractive combination of strength and formability, and crash test results show that supplementary progress in safety improvement and lightness can be reached by the use of this high strength steel. The process used for the hot forming of Boron steel permits good formability and very good in-use properties. This ultra high strength steel enables complex parts and the advantages of the pre-coated USIBOR1500 versus the current uncoated boron steels include: no need to remove the oxide layer after hot forming, no decarburization of the steel and corrosion protection of the parts. The combination of high and ultra high strength steels with new forming technique permits improved impact resistance. An example of the use of TRIP steel and hydroforming technique versus a conventional forming technique shows the advantage of this solution in terms of safety. And, a second example gives the interest of a design solution using a profile rolling technique” Cornette at 3. “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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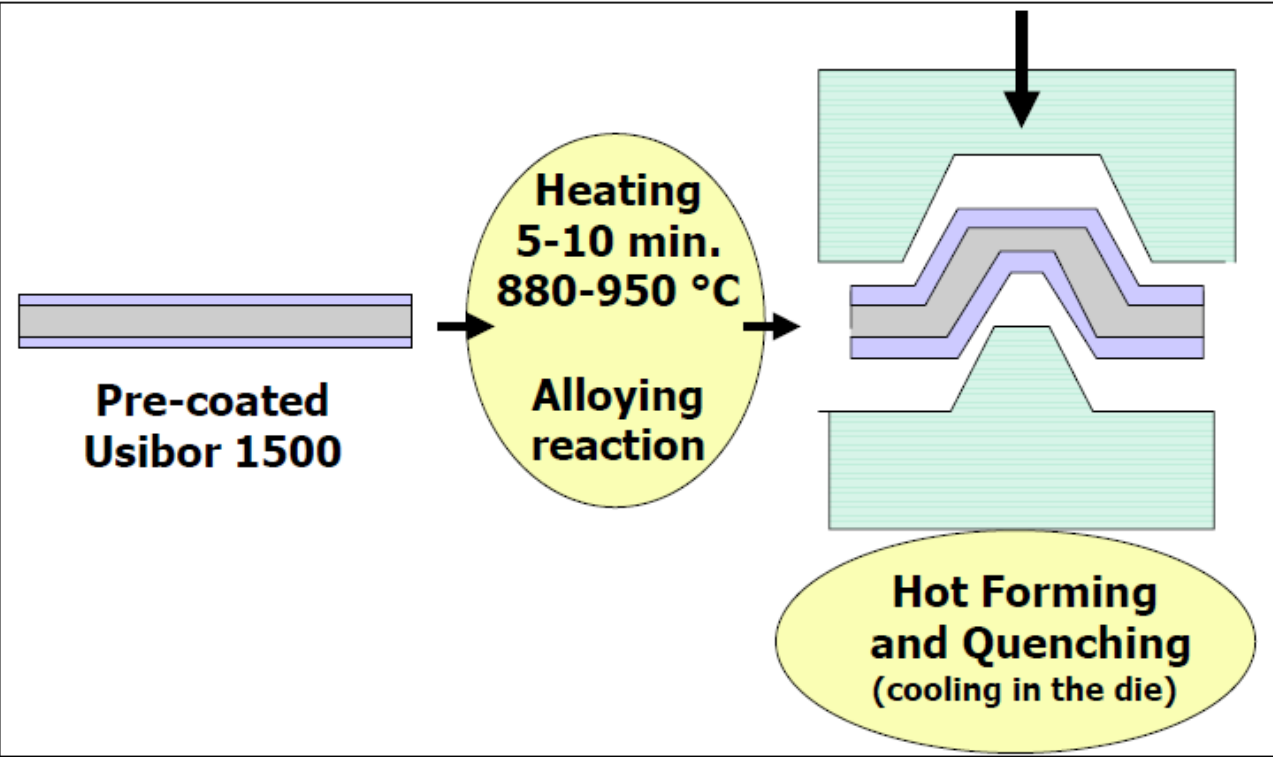
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[24a] a strip of base steel having a first side and a second side; and	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with.

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	Cornette and/or one or more prior art references disclose a strip of base steel having a first side and a second side. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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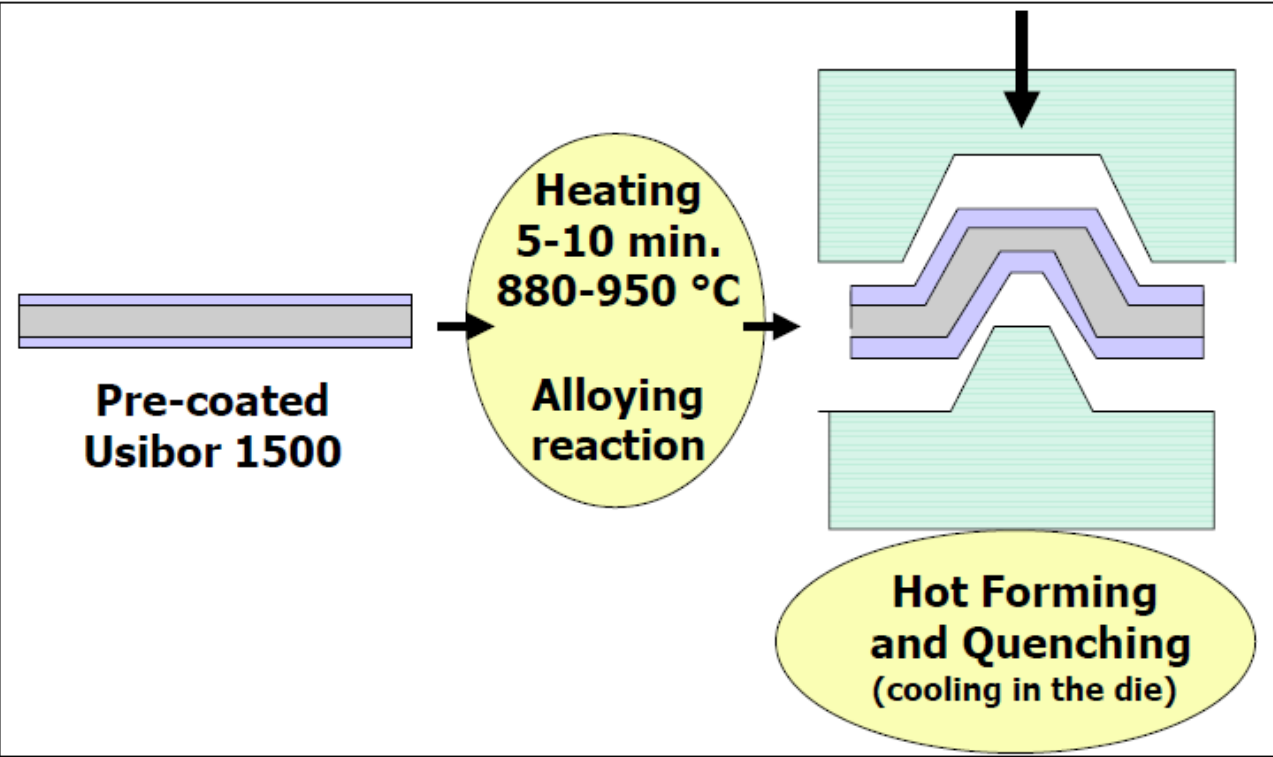
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[24b] a coating on at least one of the first side of the strip of base steel and the second side of the strip of base steel, wherein the	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with.

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coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes, proceeding from the base steel outwards:	Cornette and/or one or more prior art references disclose a coating on at least one of the first side of the strip of base steel and the second side of the strip of base steel, wherein the coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes, proceeding from the base steel outwards. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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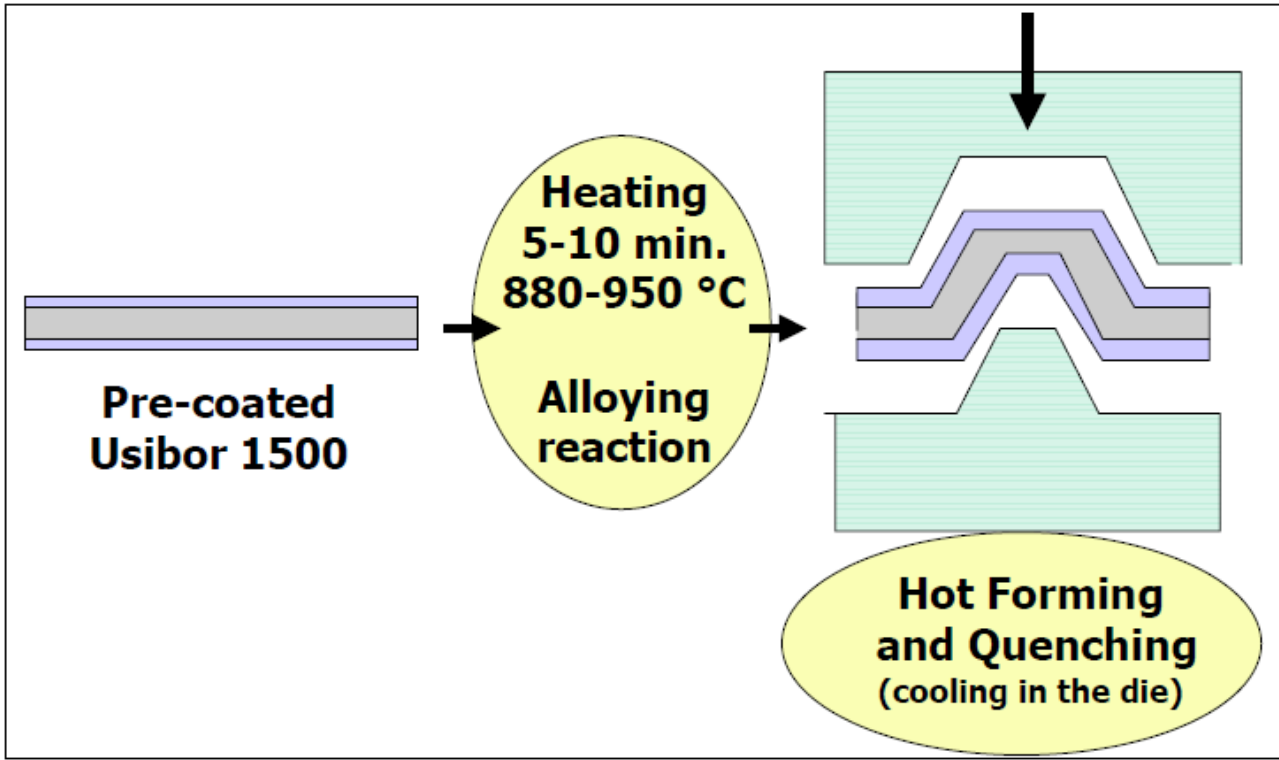
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	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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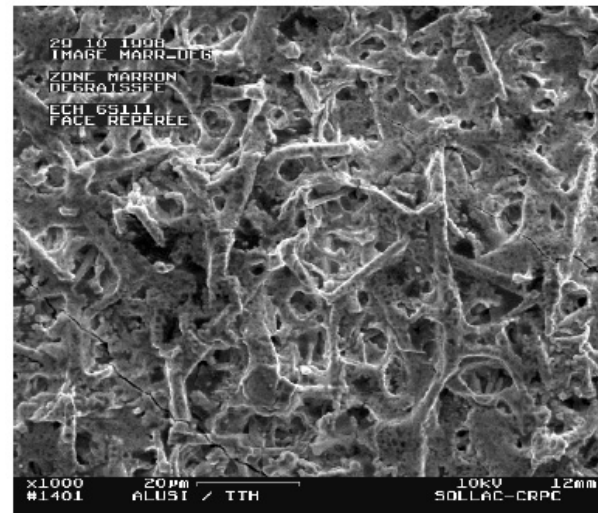
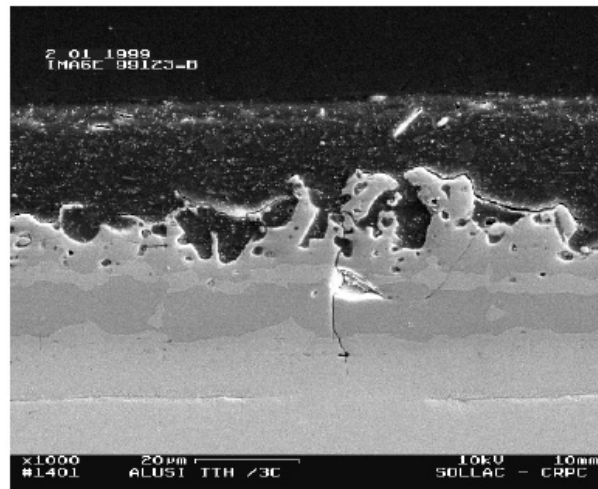


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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[24c] (a) an interdiffusion layer having a first mean aluminum composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (a) an interdiffusion layer having a first mean aluminum composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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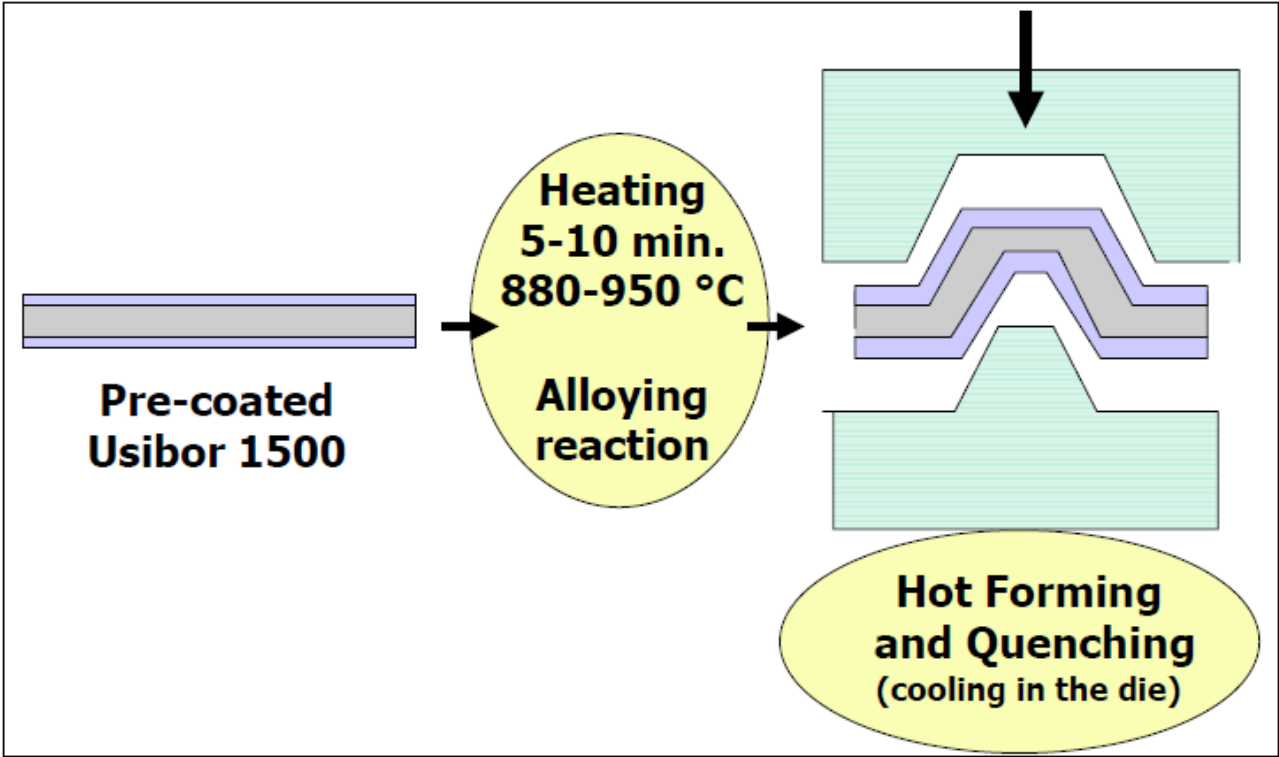
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	 The diagram illustrates the manufacturing process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular sheet of pre-coated material. This sheet enters a yellow oval labeled "Heating 5-10 min. 880-950 °C Alloying reaction". An arrow points from the heating stage to a die. The die is shown in cross-section, with a green material being pushed into it by a punch. The material is then formed into a complex, multi-layered shape. A yellow oval labeled "Hot Forming and Quenching (cooling in the die)" is positioned below the die, indicating the final step of the process. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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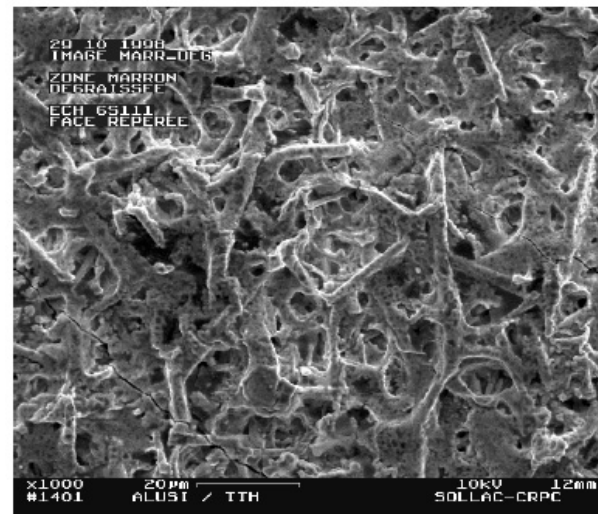
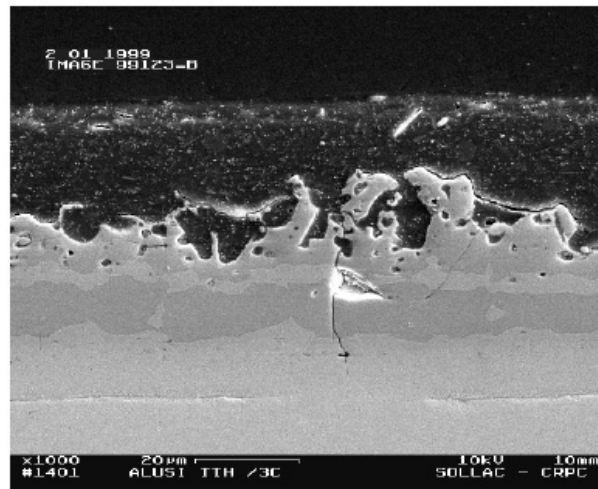


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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[24d] (b) an intermediate layer having a second mean aluminum composition different from the first mean aluminum composition,	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (b) an intermediate layer having a second mean aluminum composition different from the first mean aluminum composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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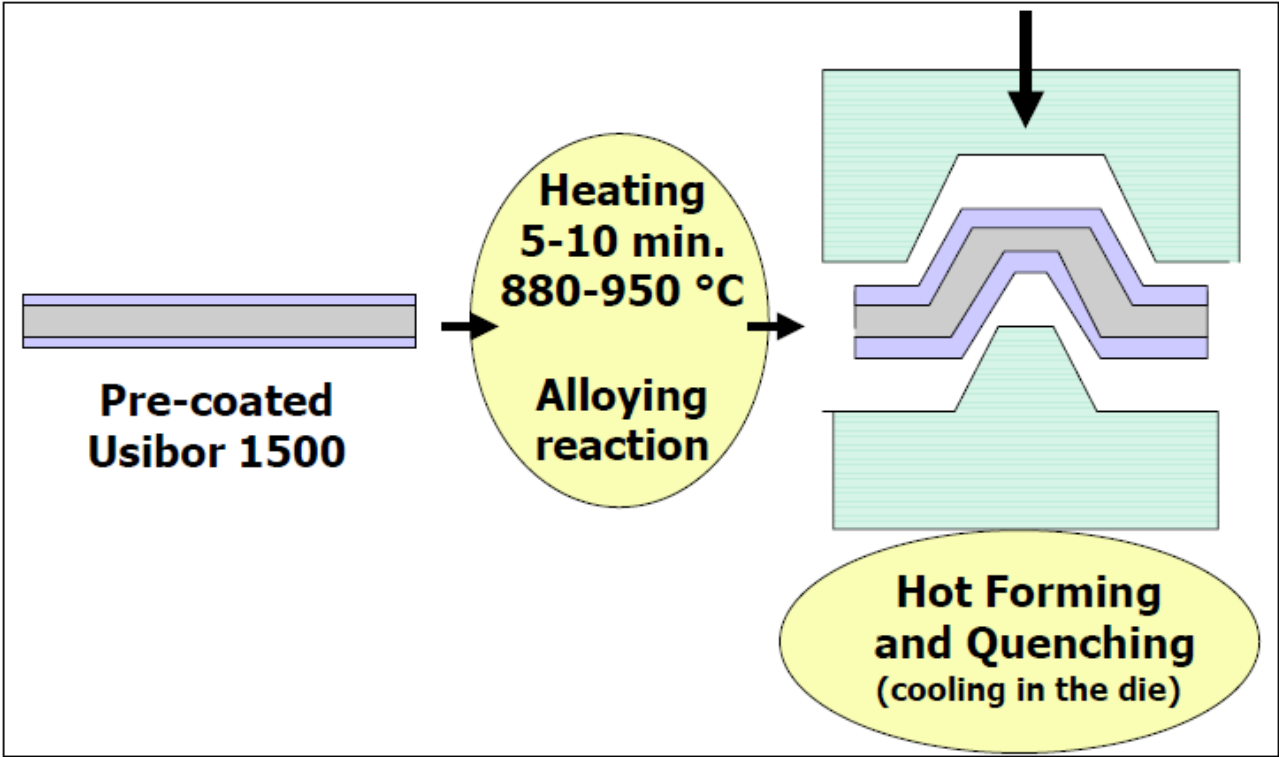
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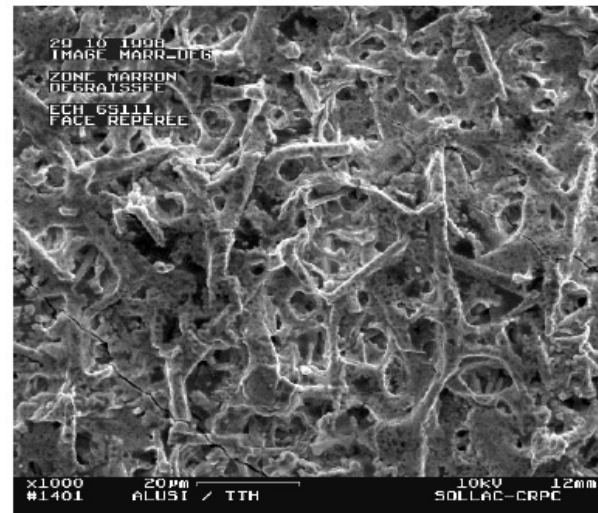
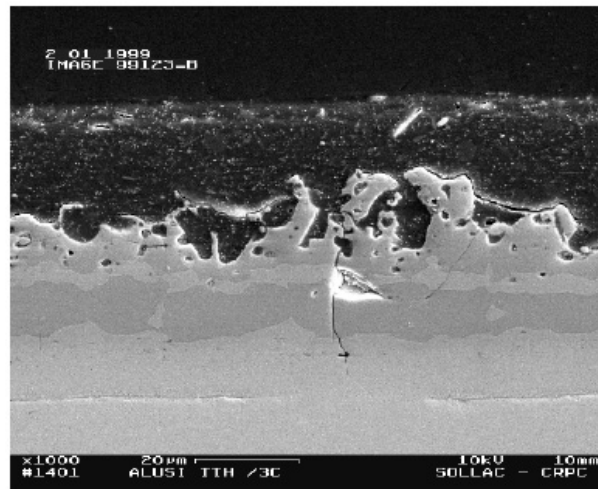


Fig. 22. Section view and coating surface after heat treatment.

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[24e] (c) an intermetallic layer having a third mean aluminum composition different from the first and second mean aluminum compositions, and	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (c) an intermetallic layer having a third mean aluminum composition different from the first and second mean aluminum compositions. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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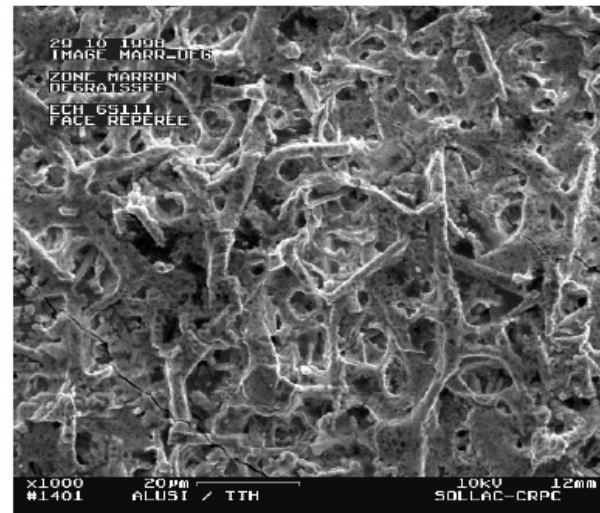
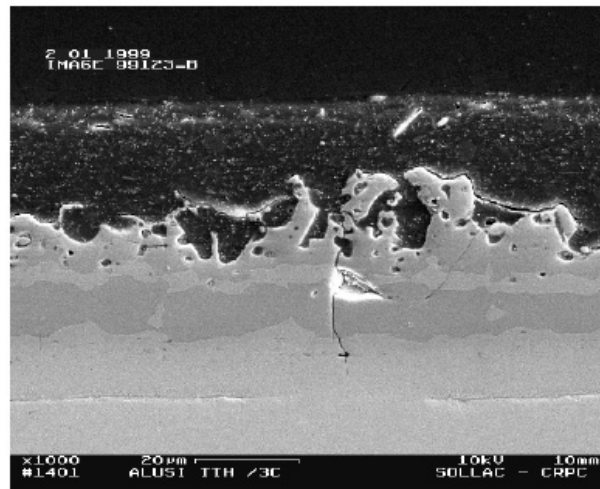


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

EXHIBIT B-14

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[24f] (d) a superficial layer having a fourth mean aluminum composition different from the first, second and third mean aluminum compositions, the second mean aluminum composition being greater than the third mean aluminum composition;	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (d) a superficial layer having a fourth mean aluminum composition different from the first, second and third mean aluminum compositions, the second mean aluminum composition being greater than the third mean aluminum composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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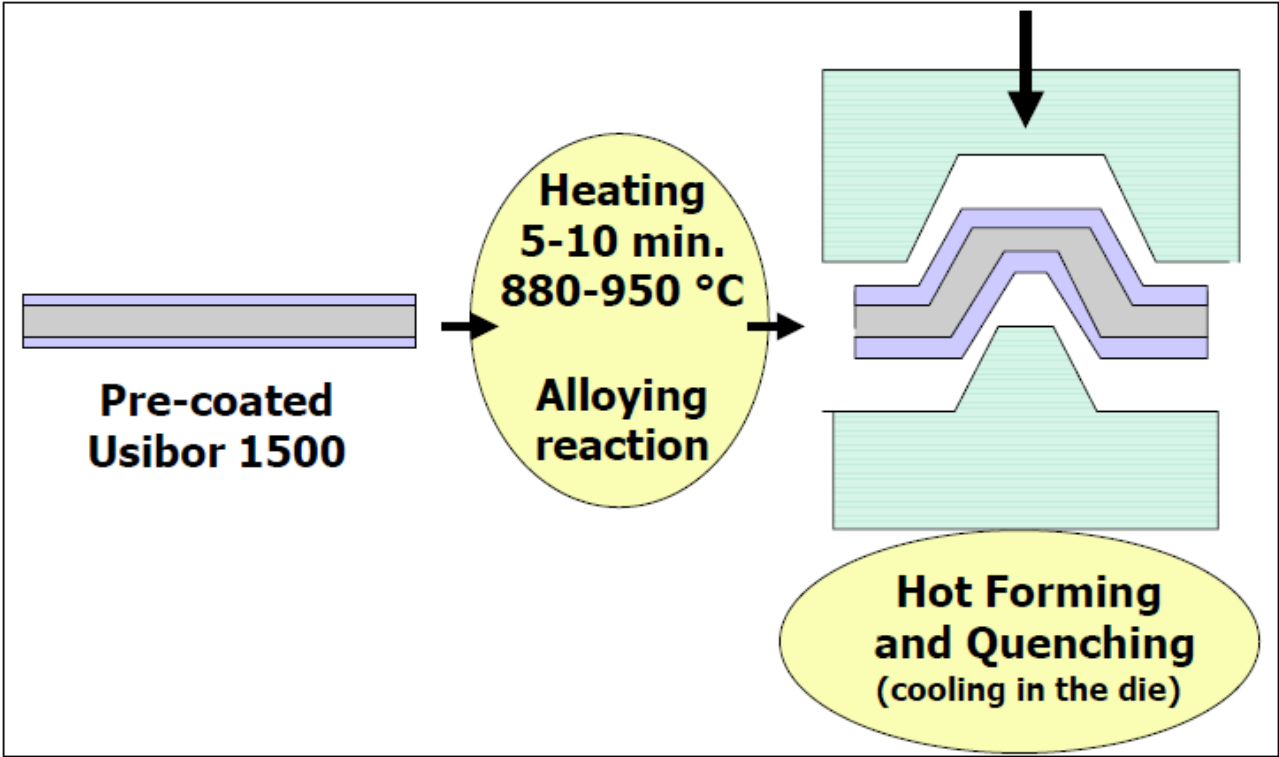
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	 Pre-coated Usibor 1500 Heating 5-10 min. 880-950 °C Alloying reaction Hot Forming and Quenching (cooling in the die) Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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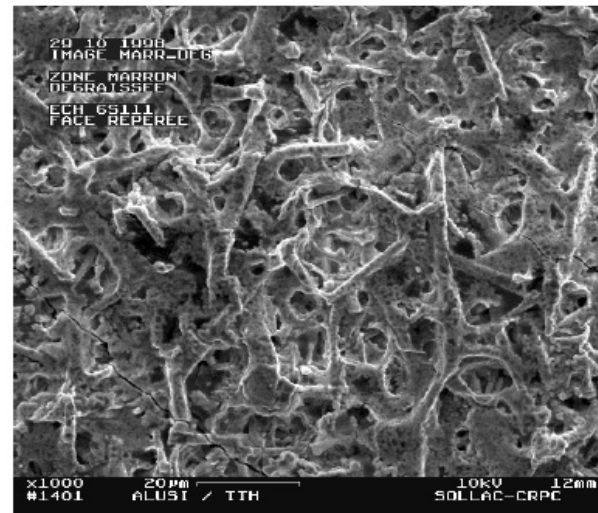
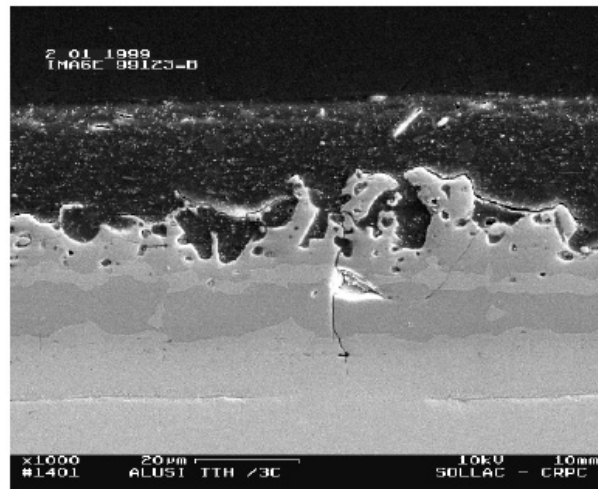


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

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[24g] wherein the coating has a thickness greater than 30 micrometers.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose wherein the coating has a thickness greater than 30 micrometers. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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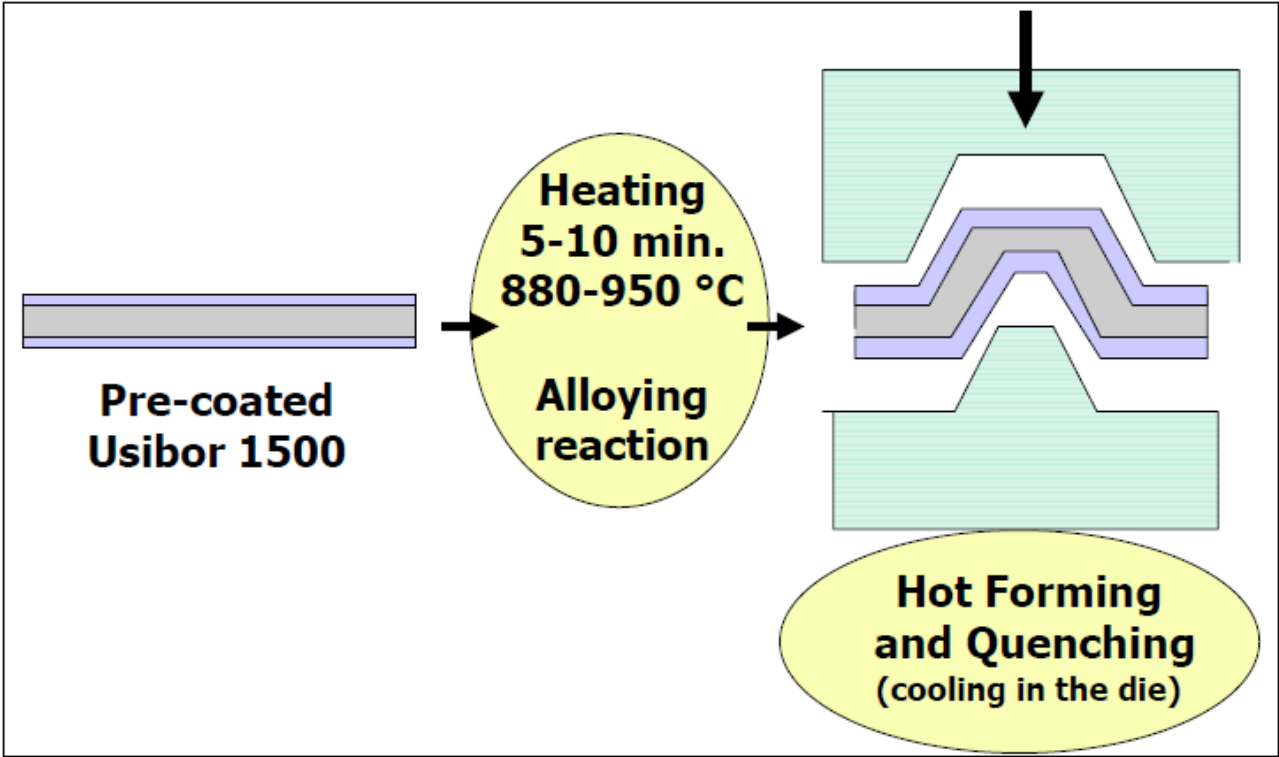
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	 The diagram illustrates the manufacturing process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular sheet of pre-coated material. This sheet enters a yellow oval labeled 'Heating 5-10 min. 880-950 °C Alloying reaction'. After heating, the material is fed into a die where it is formed into a complex, multi-layered cross-like shape. This final step is labeled 'Hot Forming and Quenching (cooling in the die)' in a yellow oval. A black arrow points down into the die, indicating the direction of material flow. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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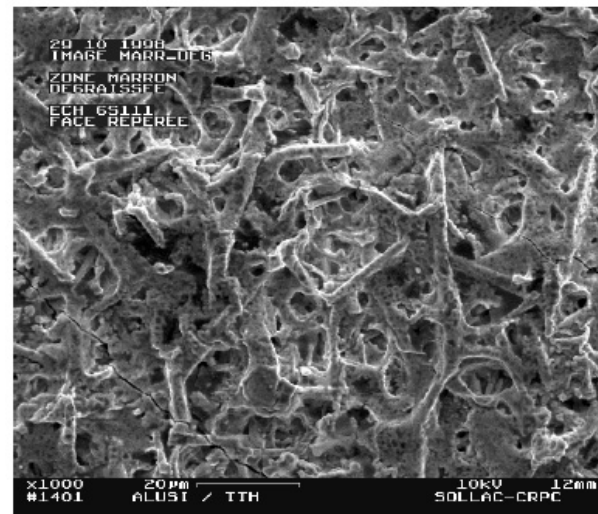
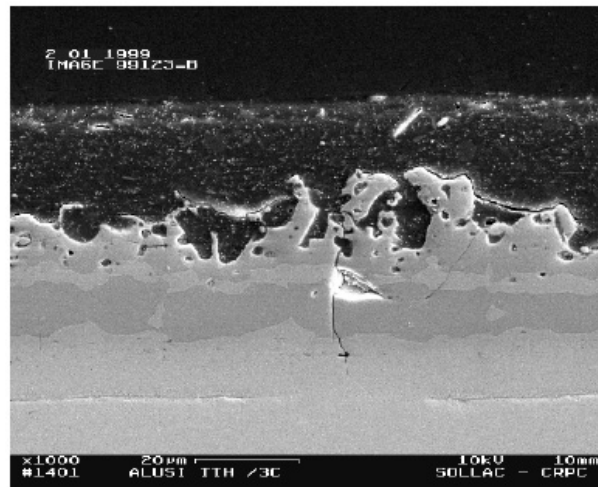


Fig. 22. Section view and coating surface after heat treatment.

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Cornette at 9-10.

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Claim 25	
[25] The precoated steel product as recited in claim 24 wherein the fourth mean aluminum composition is less than the second mean aluminum composition.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 24 wherein the fourth mean aluminum composition is less than the second mean aluminum composition. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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	The diagram illustrates the manufacturing process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular sheet of pre-coated material. This sheet undergoes a heating process, represented by a yellow oval containing the text 'Heating 5-10 min. 880-950 °C Alloying reaction'. Following heating, the material is fed into a die, indicated by a downward-pointing arrow. The die forms the material into a complex, multi-layered shape. This final step is labeled 'Hot Forming and Quenching (cooling in the die)' in a yellow oval. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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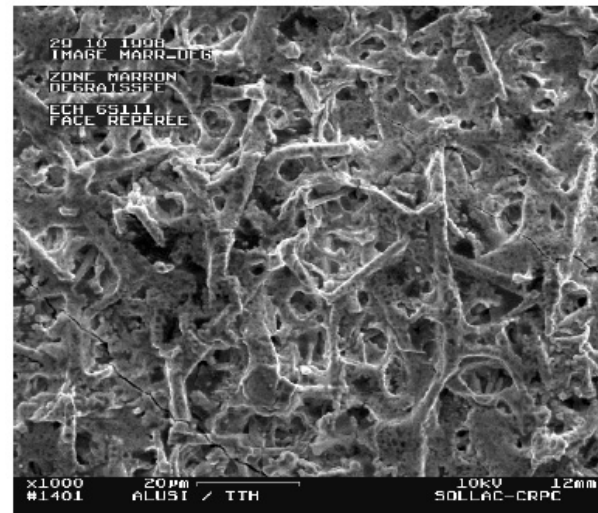
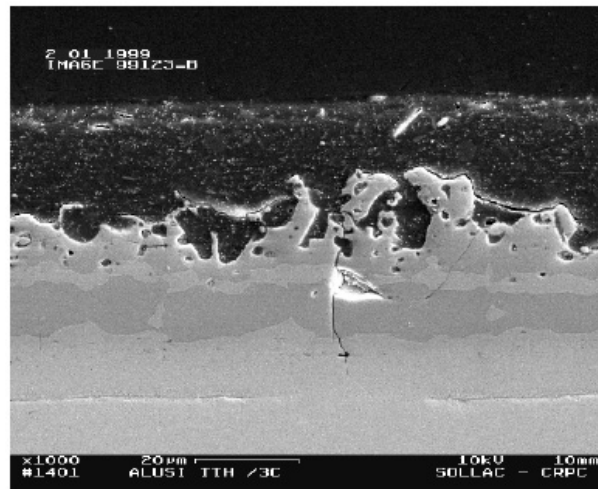


Fig. 22. Section view and coating surface after heat treatment.

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Claim 26	
[26] The precoated steel product as recited in claim 24 wherein the layer (a) has a thickness less than 15 micrometers.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 24 wherein the layer (a) has a thickness less than 15 micrometers. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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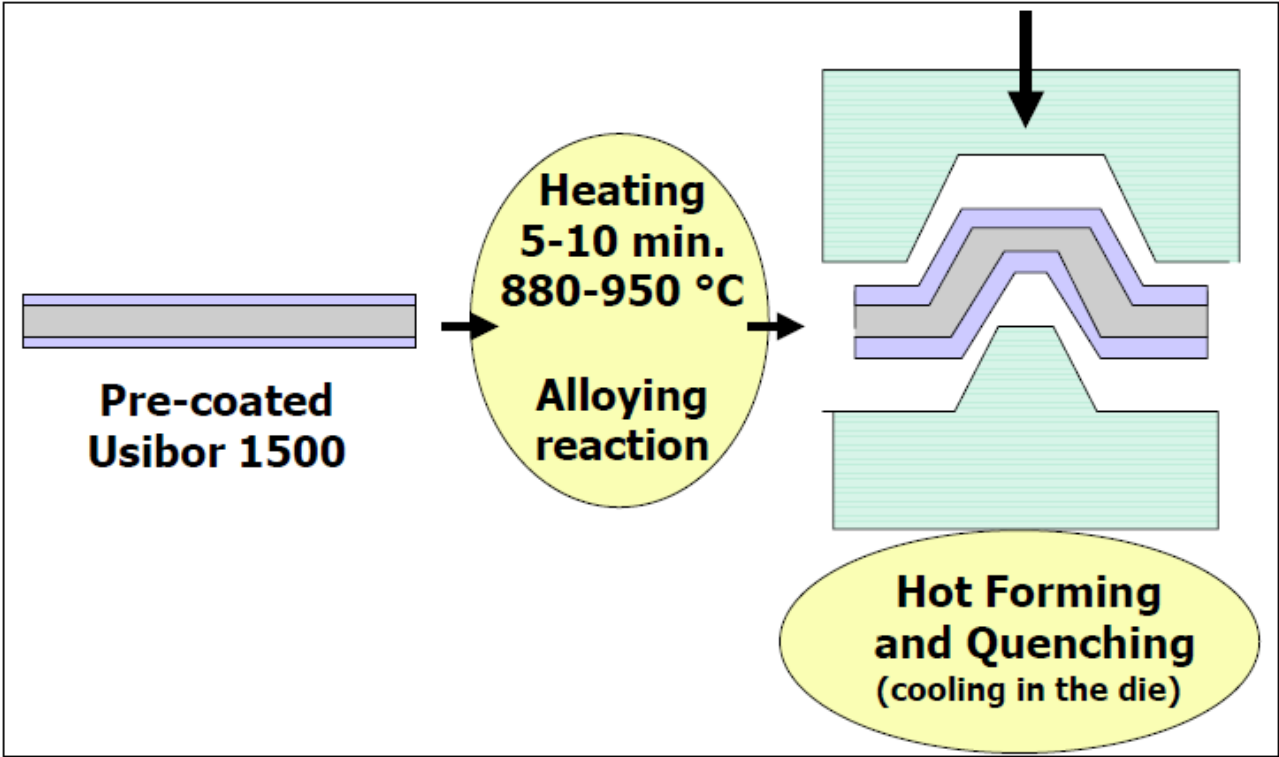
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	 The diagram illustrates the manufacturing process for USIBOR 1500 Pre-coated. It begins with a flat, rectangular sheet of pre-coated material. This sheet enters a yellow oval labeled 'Heating 5-10 min. 880-950 °C Alloying reaction'. After heating, the material is fed into a die where it is formed into a complex, multi-layered shape. This final step is labeled 'Hot Forming and Quenching (cooling in the die)' in a yellow oval. A black arrow points down into the die, indicating the direction of material flow. Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated. “CHEMICAL COMPOSITION OF THE BASE MATERIAL USIBOR 1500 is a carbon-manganese steel microalloyed with boron.” Cornette at 9.

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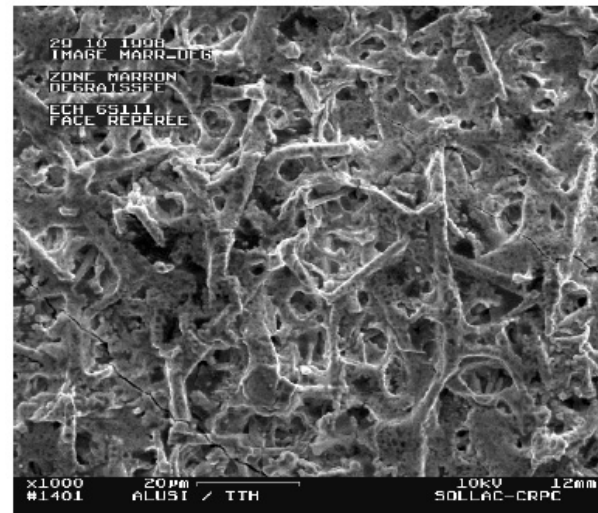
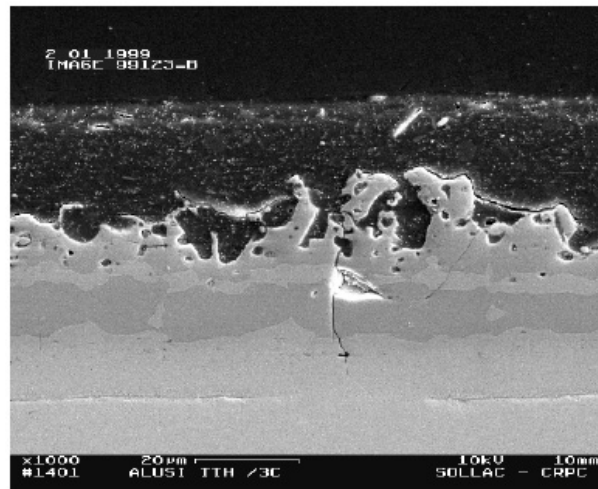


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Claim 28	
[28] The precoated steel product as recited in claim 24 wherein the intermediate layer comprises the following components by weight based on total weight: 39 to 47% Fe, 53 to 61% Al, and 0 to 2% Si.	The ALJ has not yet construed the claims and therefore the meaning of the terms in the claims has yet to be resolved by the ALJ. The support identified here for this limitation is responsive to Complainant’s infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the precoated steel product as recited in claim 24 wherein the intermediate layer comprises the following components by weight based on total weight: 39 to 47% Fe, 53 to 61% Al, and 0 to 2% Si. For example: “Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection.” Cornette at 9.

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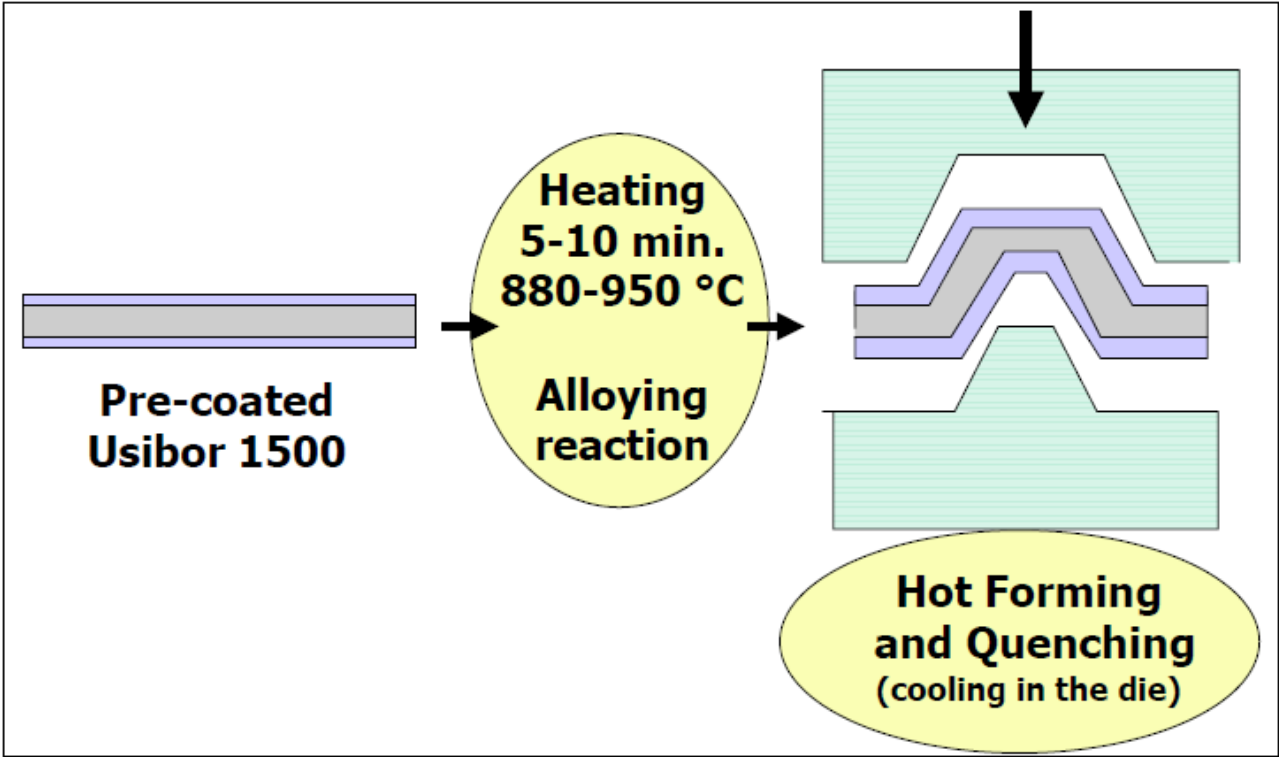
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	Table III. Chemical composition of pre-coated boron steel in thousandths of percent <table><tr><td></td><td>C</td><td>Mn</td><td>Si</td><td>S</td><td>Cr</td><td>Al</td><td>B</td><td>Ti</td></tr><tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr><tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr></table> “The coating, made of aluminum and silicon, is applied with a hot dipped process. The average layer thickness showing the best compromise between corrosion protection and weldability is 25 μm. Heating the pre-coated boron steel (generally 900°C, 5 minutes) creates an alloying reaction between substrate (iron) and the coating (aluminum - silicon) which leads to a hard multiphase alloy layer. Fe-Al-Si layer is typically about 40 μm at the steel surface. The following photo shows a section view of the coating after heat treatment:		C	Mn	Si	S	Cr	Al	B	Ti	Min.	200	1100	150		150	20	2	20	Max.	250	1350	350	8	300	60	4	50
	C	Mn	Si	S	Cr	Al	B	Ti																				
Min.	200	1100	150		150	20	2	20																				
Max.	250	1350	350	8	300	60	4	50																				

EXHIBIT B-14

Invalidity of U.S. Patent Nos. 10,961,602 in View of Cornette et al., “High Strength Steels for Automotive Safety Parts,” SAE Technical Paper Series 2001-01-0078 (2001) (“Cornette”) alone and/or in view of One or More Prior Art References

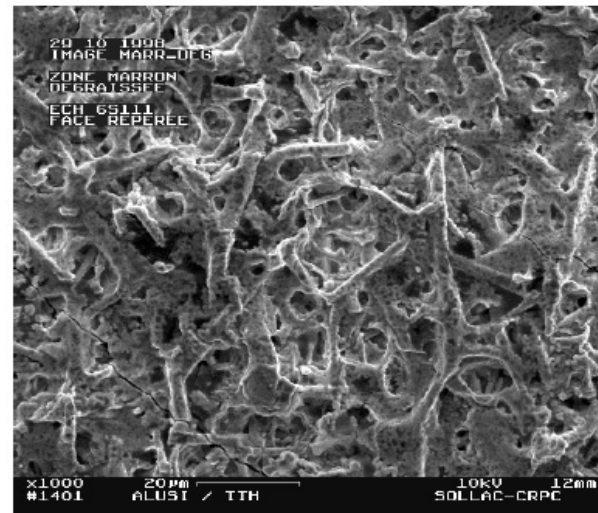
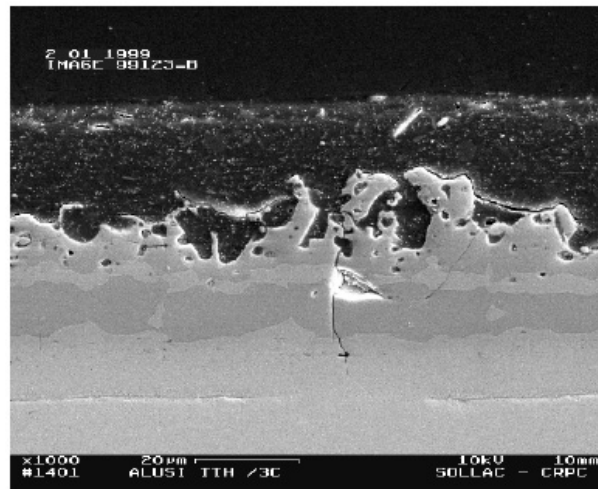


Fig. 22. Section view and coating surface after heat treatment.

Cornette at 9-10.

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