

EXHIBIT B-03

Invalidity of U.S. Patent Nos. 10,961,602 in View of U.S. Patent 6,296,805 (“Laurent”) alone and/or in view of One or More Prior Art References

U.S. Patent No. 6,296,805 (“Laurent”), issued on October 2, 2001 from an application filed on July 9, 1999, 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 Laurent 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 Laurent and/or to combine the teachings of Laurent 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, Laurent and/or one or more prior art references disclose a precoated steel product. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46.

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[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. Laurent and/or one or more prior art references disclose a strip of base steel having a first side and a second side. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46

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	“The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64. “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and

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	for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
[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 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:	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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract.

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	“The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 0.20%<carbon<0.5% 0.8%<manganese<1.5% 0.1% silicon<0.35% 0.01%<chromium<1%

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	titanium<0.1% aluminum<0.1% phosphorus<0.05% sulfur<0.03% 0.0005%<boron<0.01%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56

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	“At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43

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	“The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent and/or one or more prior art references disclose (a) an interdiffusion layer having a first mean iron composition. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%

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	0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 0.20%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of

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	elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36.

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	“In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the

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	time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the

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	sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8.

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	“It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of

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	elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36.

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	“In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8.

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	“It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56

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	“At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009%

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	copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment

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	applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
[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. Laurent and/or one or more prior art references disclose wherein the coating has a thickness greater than 30 micrometers. For example: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment

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	and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48

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	“Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56

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	“At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36.

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	“In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by

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	an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
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%;	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. Laurent 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%;

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and further comprises iron and impurities inherent in processing.	and further comprises iron and impurities inherent in processing. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64

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	“The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5% 0.5%<manganese<3%

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	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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43
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%;	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. Laurent 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%;

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sulfur<0.03%; 0.0005%<boron<0.01%; and further comprises iron and impurities inherent in processing.	sulfur<0.03%; 0.0005%<boron<0.01%; and further comprises iron and impurities inherent in processing. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64

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	“The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43
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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight: 0.15%<carbon<0.5% 0.5%<manganese<3%

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	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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05%

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	0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon

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	and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.

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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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to

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	corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56

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	“At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace,

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	for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight: 0.15%<carbon<0.5% 0.5%<manganese<3% 0.1%<silicon<0.5% 0.01%<chromium<1%

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	titanium<0.2% aluminum<0.1% phosphorus<0.1% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64

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	“The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14

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Claim 8	

EXHIBIT B-03**Invalidity of U.S. Patent Nos. 10,961,602 in View of U.S. Patent 6,296,805 (“Laurent”) alone and/or in view of One or More Prior Art References**

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[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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46

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	“The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following:

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	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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be

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	followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
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. Laurent 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: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment

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	and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48

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	“Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
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. Laurent 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: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46

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	“The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43

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	“According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight: 0.15%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 0.20%<carbon<0.5% 0.8%<manganese<1.5% 0.1% silicon<0.35% 0.01%<chromium<1%

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	titanium<0.1% aluminum<0.1% phosphorus<0.05% sulfur<0.03% 0.0005%<boron<0.01%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%

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	0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43
Claim 18	
[18] The precoated 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. Laurent and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the interdiffusion layer has a thickness of from 1 micron to 15 microns. For example: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment

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	and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48

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	“Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
Claim 20	
[20] The precoated 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. Laurent and/or one or more prior art references disclose the precoated steel product as recited in claim 1 wherein the fourth mean iron composition is lower than the third mean iron composition. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight: 0.15%<carbon<0.5% 0.5%<manganese<3% 0.1%<silicon<0.5% 0.01%<chromium<1% titanium<0.2%

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	aluminum<0.1% phosphorus<0.1% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 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%

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	0.0005%<boron<0.01%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon

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	and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43
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, Laurent and/or one or more prior art references disclose a precoated steel product comprising. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract.

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	“The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46.
[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. Laurent and/or one or more prior art references disclose a strip of base steel having a first side and a second side. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract.

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	“The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64. “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the

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	time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron,

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	0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
[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 coating results from interdiffusion between the base steel, and an aluminum or aluminum alloy pre-coating, and wherein the coating includes,	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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight:

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proceeding from the base steel outwards:	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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01%

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	sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment

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	and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23

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	“Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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.

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	Laurent and/or one or more prior art references disclose (a) an interdiffusion layer having a first mean iron composition. For example: “” Laurent at [XXX].
[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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5% 0.5%<manganese<3% 0.1%<silicon<0.5% 0.01%<chromium<1% titanium<0.2% aluminum<0.1%

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	phosphorus<0.1% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal

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	treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g.

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	Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%

EXHIBIT B-03**Invalidity of U.S. Patent Nos. 10,961,602 in View of U.S. Patent 6,296,805 (“Laurent”) alone and/or in view of One or More Prior Art References**

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	sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence

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	of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47

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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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon

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	and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59

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	“Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.

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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. Laurent and/or one or more prior art references disclose] wherein the coating has a thickness greater than 30 micrometers. For example: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5% 0.5%<manganese<3% 0.1%<silicon<0.5% 0.01%<chromium<1% titanium<0.2% aluminum<0.1%

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	phosphorus<0.1% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8.

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	“The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight: 0.15%<carbon<0.5% 0.5%<manganese<3%

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	0.1% silicon<0.5% 0.01%<chromium<1% titanium<0.2% aluminum<0.1% phosphorus<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to

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	11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43
Claim 24	

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[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, Laurent and/or one or more prior art references disclose a precoated steel product. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46.

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[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. Laurent and/or one or more prior art references disclose a strip of base steel having a first side and a second side. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46

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	“The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64. “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and

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'602 Patent	U.S. Patent No. 6,296,805 (“Laurent”) alone and/or in view of One or More Prior Art References
	for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
[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 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:	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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%

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Invalidity of U.S. Patent Nos. 10,961,602 in View of U.S. Patent 6,296,805 (“Laurent”) alone and/or in view of One or More Prior Art References

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	0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 0.20%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of

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	elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009%

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	copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent and/or one or more prior art references disclose (a) an interdiffusion layer having a first mean aluminum composition. For example: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight: 0.15%<carbon<0.5% 0.5%<manganese<3% 0.1%<silicon<0.5% 0.01%<chromium<1%

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	titanium<0.2% aluminum<0.1% phosphorus<0.1% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The invention relates to a coated, hot- and cold-rolled steel sheet comprising a very high resistance after thermal treatment.” Laurent at 1:6-8 “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64

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	“The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The invention also concerns the use of the hot-rolled steel sheet which then can be cold-rolled and coated, for structural and/or anti-intrusion or substructure castings for a land motor vehicle, such as, for example, a bumper bar, a door reinforcement, a wheel spoke.” Laurent at 2:30-34 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45.

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	“The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31.

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	“Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
[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.

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	Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23

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	“This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31. “Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If

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	the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent 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:

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	“Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and

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'602 Patent	U.S. Patent No. 6,296,805 (“Laurent”) alone and/or in view of One or More Prior Art References
	for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47
[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. Laurent 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: “The coating has in particular the function of protecting the basic sheet against hot as well as cold corrosion. The mechanical characteristics in the delivery state of the sheet according to the invention

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	allow a great variety of shaping, in particular a deep stamping. The thermal treatment applied at the time of a hot-shaping process or after shaping makes it possible to obtain high mechanical characteristics which may exceed 1500 MPa for mechanical resistance and 1200 MPa for the limit of elasticity. The final mechanical characteristics are adjustable and depend on the carbon content of the steel and on the thermal treatment.” Laurent at 2:45-56 “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “A second coating layer, on top of the first, contains approximately 90% aluminum and may contain silicon and a small amount of iron, depending on the composition of the bath.” Laurent at 3:20-23 “This rise in temperature makes possible a rapid remelting of the aluminum which fills in the cracks generated by the operation of shaping of the casting.” Laurent at 3:29-31.

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	“Another advantage of the invention lies in the fact that the diffusion of the iron in the coating will be initiated at high temperature. One thus will have a better cohesion between coating and steel in the sheet. In another form of the invention, the thermal treatment may be performed locally, in heavily deformed zones.” Laurent at 3:32-36. “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “The sheet, a coated siderurgic product, has a substantial resistance to corrosion in the delivery state, during shaping and thermal treatments as well as during usage of the finished casting. After thermal treatment, a substantial mechanical resistance, which may exceed 1500 MPa, is obtained. The presence of the coating at the time of thermal treatment of the castings makes it possible to prevent any decarbonization of the base metal as well as any oxidation. That is an undeniable advantage, in particular in the case of hot-shaping. Furthermore, heating of the treated casting does not require a furnace having a controlled atmosphere to prevent a decarbonization.” Laurent at 3:49-59 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the

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	critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “It also is possible to obtain in particular ferrito-bainitic or ferrito-martensitic structures, by a heating at a temperature ranging between Ac1, for example 750° C. and Ac3, for example 840° C., followed by an appropriate cooling. According to the level of resistance to be achieved and the thermal treatment applied, one or several of these phases is/are present in variable proportions. For the highest resistance levels, the structure is composed predominantly of martensite.” Laurent at 4:9-17 “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46 “At the time of thermal treatment, the base coating, of aluminum for example, is transformed into a layer alloyed with iron and comprising different phases depending on the thermal treatment and having a considerable hardness which may exceed 600 HV100 g. Table 2 presents an example of maximal resistance of the steel sheet according to the invention after thermal treatment.” Laurent at 4:47.
[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. Laurent and/or one or more prior art references disclose wherein the coating has a thickness greater than 30 micrometers. For example: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to

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	corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron,

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	0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43 “According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
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. Laurent 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:

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	“Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 0.20%<carbon<0.5%

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	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%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 0.15%<carbon<0.5% 0.5%<manganese<3% 0.1%<silicon<0.5% 0.01%<chromium<1% titanium<0.2%

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	aluminum<0.1% phosphorus<0.1% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43
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. Laurent 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: “The purpose of the invention is to produce a hot- or cold-rolled steel sheet of a desired thickness, coated, and affording extensive shaping possibilities and which, after thermal treatment performed on the finished casting, makes it possible to obtain a mechanical resistance in excess of 1000 MPa, a substantial resistance to shocks, fatigue, abrasion and wear, while retaining a good resistance to corrosion as well as a good capacity for painting and gluing. It also is possible to carry out hot-shaping with hardening in the tool making it possible to obtain the same properties.” Laurent at 1:37-46

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	“The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 µm in thickness.” Laurent at 3:37-43

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	“According to the invention the sheet, in the delivery state in a coil or in sheeting, the thickness of which may range between 0.25 mm and 15 mm, has good shaping properties and a good resistance to corrosion as well as a good capacity for painting or gluing.” Laurent at 3:44-48 “Thermal treatment of the metal in the sheet consists in a heating at a temperature ranging between Ac1, starting temperature of austenitic transformation, for example 750° C. and 1200° C., in a furnace, for a period which depends on the temperature to be reached and the thickness of the casting sheet. The composition is optimized so as to limit the enlargement of the grains at the time of thermal treatment. If the structure sought is completely martensitic, the holding temperature should be in excess of Ac3, for example 840° C., ending temperature of austenitic formation. The temperature holding should be followed by a cooling adjusted to the final structure sought. For a completely martensitic structure and for a steel having the composition of the example, the speed of cooling should be in excess of the critical speed of hardening which is 27° C./s for an austenitizing at 900° C. for 5 min., the sheet having a thickness of approximately 1 mm.” Laurent at 3:60-4:8. “The modulation of thermal treatment parameters makes it possible to achieve, with a given composition, different levels of hot and cold sheet resistance according to the thickness sought.” Laurent at 4:43-46
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. Laurent 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: “Hot-rolled steel sheet which then can be cold-rolled, coated, the steel in the sheet having the following composition by weight:

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	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%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” Laurent at Abstract. “The subject of the invention is a hot-rolled steel sheet, which then can be cold-rolled, coated, the steel in the sheet having the following composition by 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<0.01% sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, the sheet ensuring a very high mechanical resistance after thermal treatment and the aluminum-based coating ensuring a high resistance to corrosion.” 1:47-64 “The other characteristics of the invention are: the composition by weight of the sheet preferably is the following: 0.20%<carbon<0.5% 0.8%<manganese<1.5% 0.1% silicon<0.35%

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	0.01%<chromium<1% titanium<0.1% aluminum<0.1% phosphorus<0.05% sulfur<0.03% 0.0005%<boron<0.01%, the remainder being iron and impurities inherent in processing. in the composition by weight of the sheet, the titanium content with respect to the nitrogen content is in excess of 3.42, the boron no longer being able to be combined with the nitrogen. the metal bath for the coating contains in its basic composition by weight, from 9% to 10% silicon, from 2% to 3.5% iron, the remainder being aluminum[,] the metal bath for the coating contains in its basic com position by weight, from 2% to 4% iron, the remainder being aluminum.” Laurent at 1:65-2:20 “The sheet according to the invention which derives, by reason of its processing, from a hot-rolling mill, possibly may be cold-rerolled again depending on the final thickness desired. It then is coated with an aluminum-based coating, for example by dipping in a bath containing, in addition, from 8% to 11% silicon, from 2% to 4% iron, the sheet having a high mechanical resistance after thermal treatment and a high resistance to corrosion, as well as a good capacity for painting and gluing.” Laurent at 2:37-45. “At the time of thermal treatment performed on a finished casting or at the time of a hot-shaping process, the coating forms a layer having a substantial resistance to abrasion, wear, fatigue, shock, as well as a good resistance to corrosion and a good capacity for painting and gluing. According to the invention, the steel the weight composition of which is the following: 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%

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	sulfur<0.05% 0.0005%<boron<0.08%, the remainder being iron and impurities inherent in processing, is processed in the form of a hot-rolled and possibly cold-rolled sheet to obtain the desired thickness. The steel sheet then is coated by dipping, after pickling, in an aluminum bath containing either from 8% to 11% silicon and 2% to 4% iron, or from 2% to 4% iron, or even in an aluminum bath preferably containing from 9% to 10% silicon and 2% to 3.5% iron.” Laurent at 2:57-3:14 “In an example of implementation, the steel sheet according to the invention containing 0.21% carbon, 1.14% manganese, 0.020% phosphorus, 0.0038% sulfur, 0.25% silicon, 0.040% aluminum, 0.009% copper, 0.020% nickel, 0.18% chromium, 0.0040% nitrogen, 0.032% titanium, 0.003% boron, 0.0050% calcium is coated with an aluminum-based layer about 20 μm in thickness.” Laurent at 3:37-43