EXHIBIT A-14

Invalidity of U.S. Patent Nos. 11,326,227 in View of Cornette et al., "High Strength Steels for Automotive Safety Parts," SAE Technical Paper Series 2001-01-0078 (2001) ("Cornette") alone and/or in view of One or More Prior Art References

Cornette et al., "High Strength Steels for Automotive Safety Parts," SAE Technical Paper Series 2001-01-0078 (2001) ("Cornette"), publicly available within a few weeks of March 13, 2001, qualifies as prior art under at least 35 U.S.C. §§ 102 and/or 103 for the asserted claims of U.S. Patent No. 11,326,227 ("the '227 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' 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' infringement contentions, and/or information obtained during discovery as the investigation progresses.

To the extent Complainant allege that Cornette does not disclose any particular limitation of the asserted claims of the '227 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 '227 patent to modify Cornette and/or to combine the teachings of Cornette with other prior art references, including but not limited to other prior art references discussed in detail in this claim chart, the present prior art references cited in the Cover Pleading, and the relevant section(s) of claim charts for other prior art references for the '227 patent in a manner that would have rendered the asserted claims invalid as obvious.

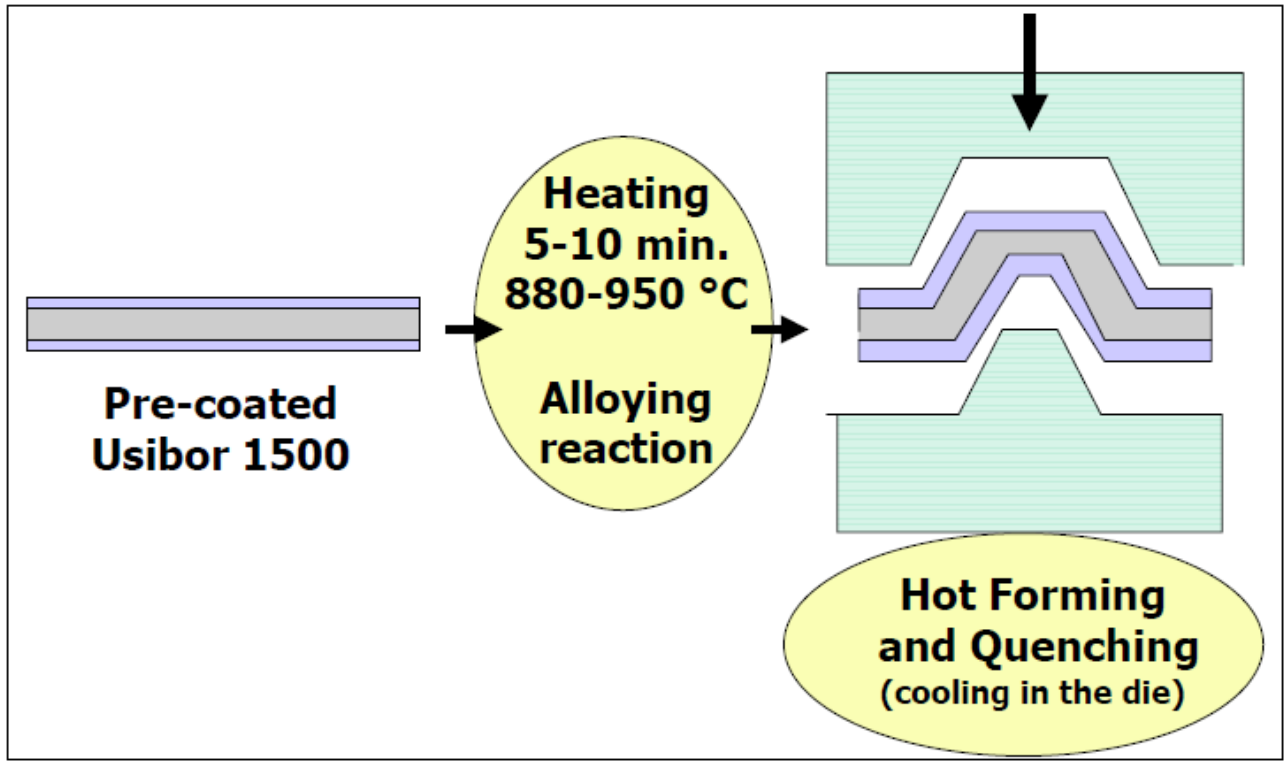
Respondents reserve the right to amend or supplement this claim chart at a later date as more fully set forth in the Cover Pleading.

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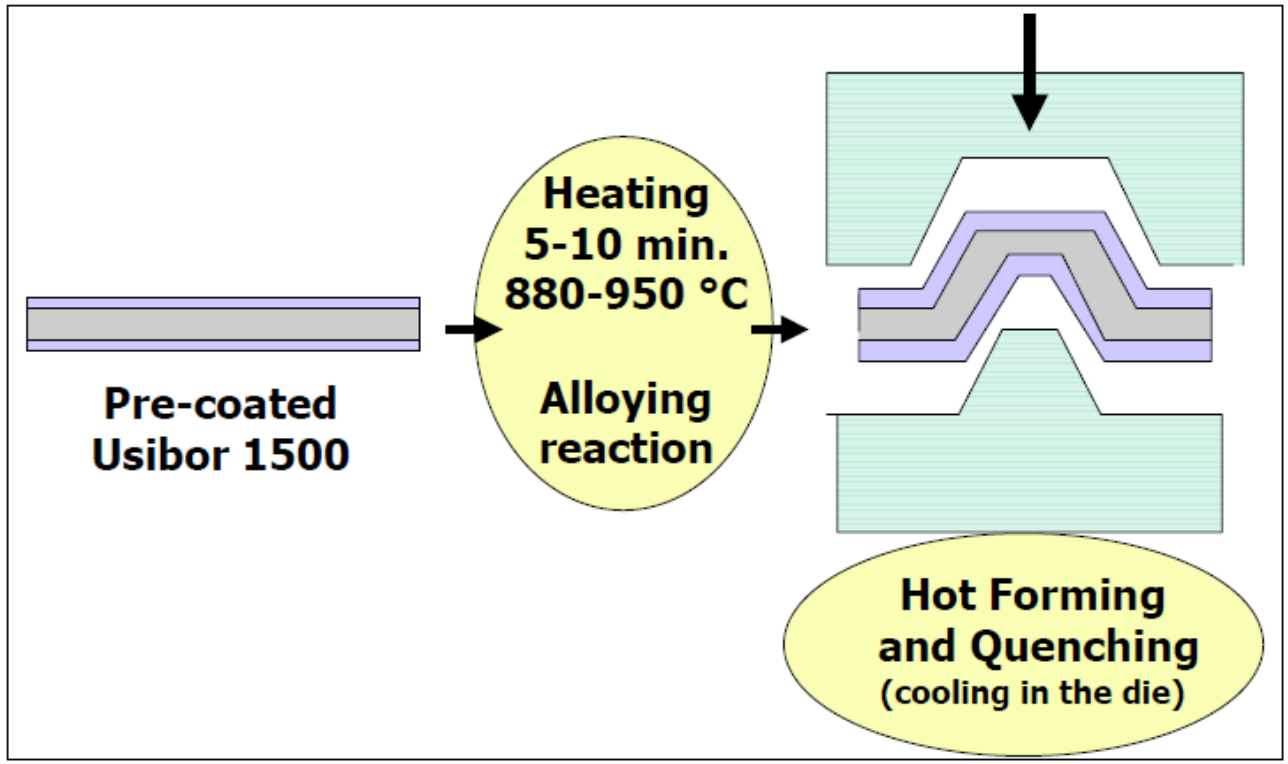
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'227 Patent	Cornette et al., "High Strength Steels for Automotive Safety Parts," SAE Technical Paper Series 2001-01-0078 (2001) ("Cornette") alone and/or in view of One or More Prior Art References
Claim 1	
[1pre] A hot stamped coated steel product, which comprises:	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' infringement contentions, which Respondents disagree with. To the extent the preamble of claim 1 is found to be limiting, Cornette and/or one or more prior art references disclose a hot stamped coated steel product. For example: "Energy savings are among the most important goals of steel users. Usinor proposes a wide range of very high strength steels (HSLA, DP, TRIP, etc.) for weight reduction and impact resistance. This text deals with the mechanical testing and different design solutions associated with these steel grades. Tensile and formability properties are presented first by means of basic tests (drawing, stretching, bending, etc.) in order to classify the different steels. A specific part of the text deals with a ultra high tensile strength pre-coated boron steel for hot forming. In addition to this, the crash resistance is investigated by using a dynamic axial compression test and a dynamic three point bending test on structural components with closed and open cross sections. For each steel grade, the estimated weight saving potential is compared with respect to parts manufactured in high drawability steel. Finally, two different designs are presented with steel solutions for safety parts. The first one shows the advantage of the use of TRIP steel and a hydroforming technique for a crash box instead of using a conventional forming technique. The second one deals with the design of a cross frontal sill with a complex cross section, formed using a profile rolling technique." Cornette at Abstract. "In the automotive industry, significant progress has been made concerning safety, fuel economy, dent resistance and comfort. To achieve these goals, a variety of steels are being used in the vehicles. Lighter cars conform more easily to environmental regulations and to fuel economy. However, safety and comfort considerations involve supplementary equipment and can be in contradiction with the pursuit of lighter weight. In order to contribute to these objectives and to solve these contradictions, formability and high strength requirements of steels increase continuously leading to the development of important new steel grades, and new shapes of safety parts are used.

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

	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[1a] (a) 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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (a) a strip of base steel having a first side and a second side. For example:

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

	 Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.
[1b] (b) a coating on at least one of said first side of said strip of base steel and said second side of said strip of base steel, wherein:	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (b) a coating on at least one of said first side of said strip of base steel and said second side of said strip of base steel. For example:

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

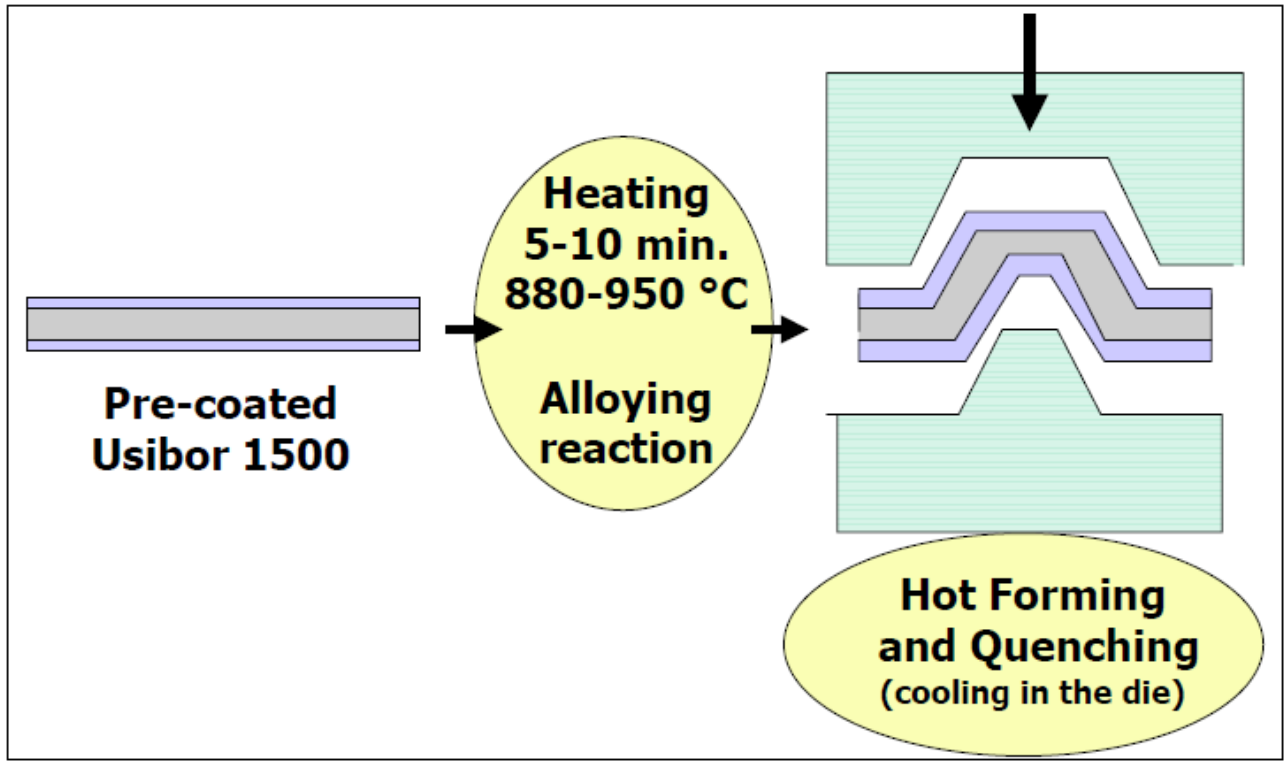


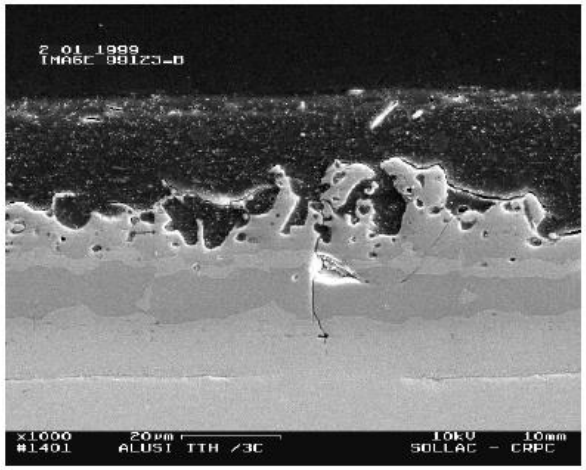
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



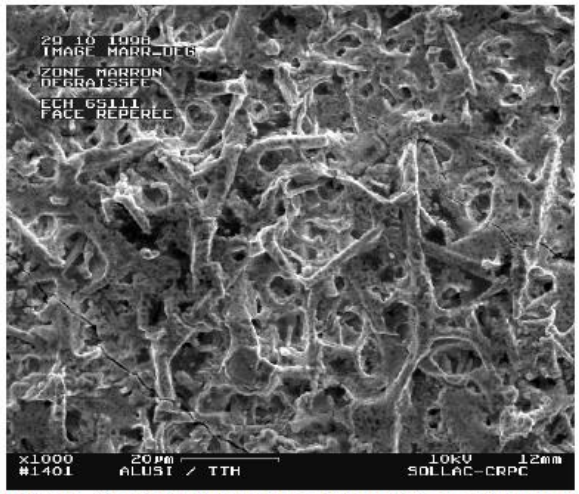


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

[1c] (i) said coating results from interdiffusion between said base steel and an aluminum or aluminum alloy pre-coating, 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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (i) said coating results from interdiffusion between said base steel and an aluminum or aluminum alloy pre-coating. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

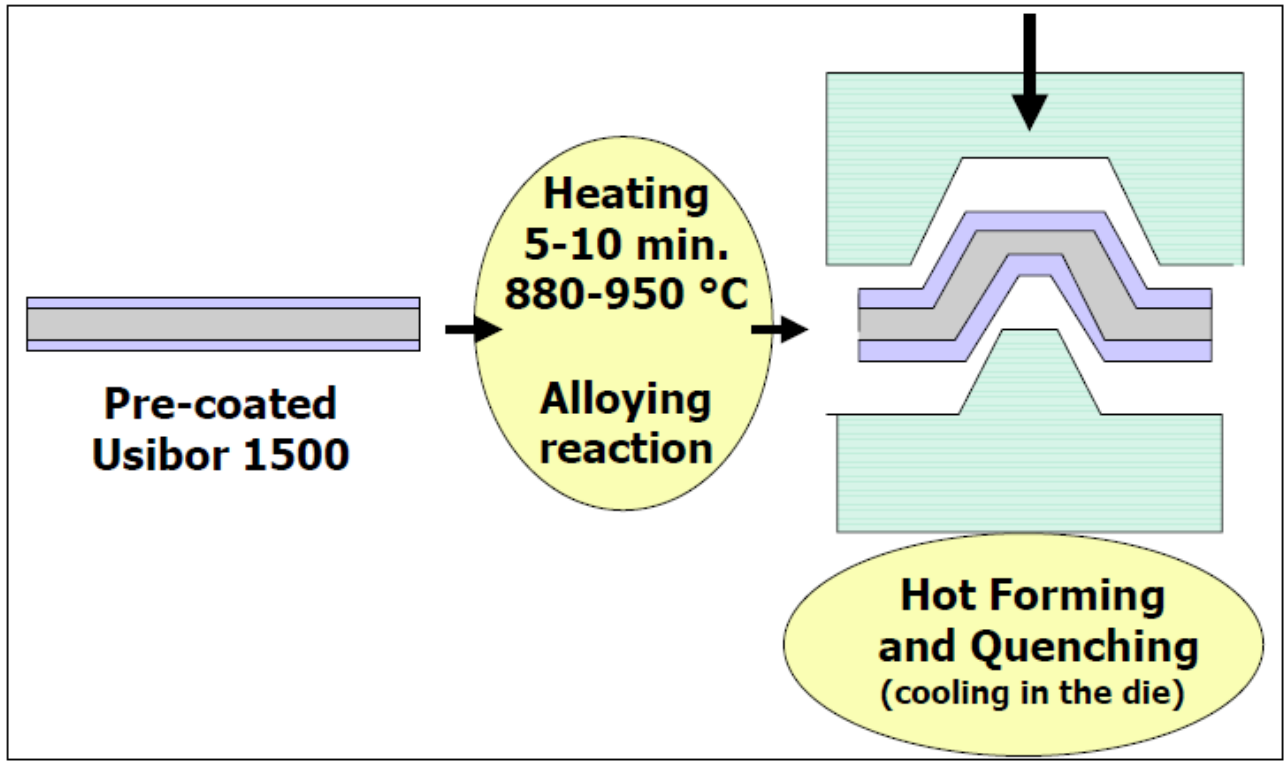


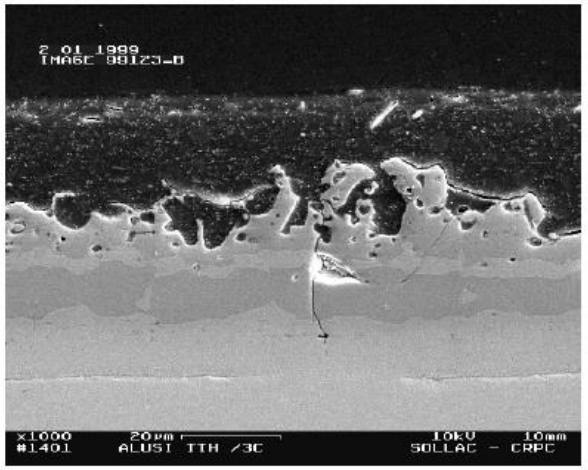
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

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



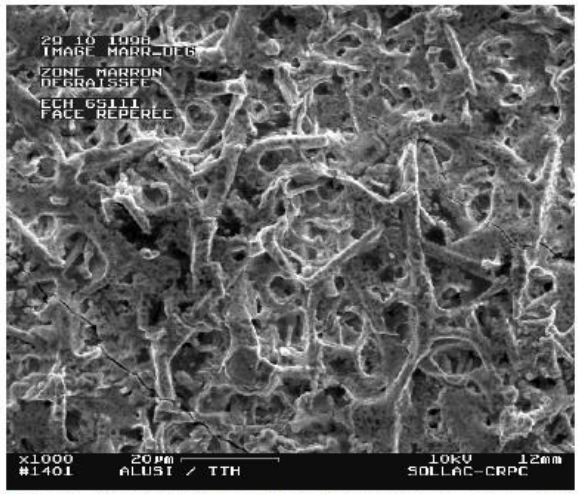


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

[1d] (ii) wherein said coating comprises, 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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (ii) wherein said coating comprises, proceeding from the base steel outwards: For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

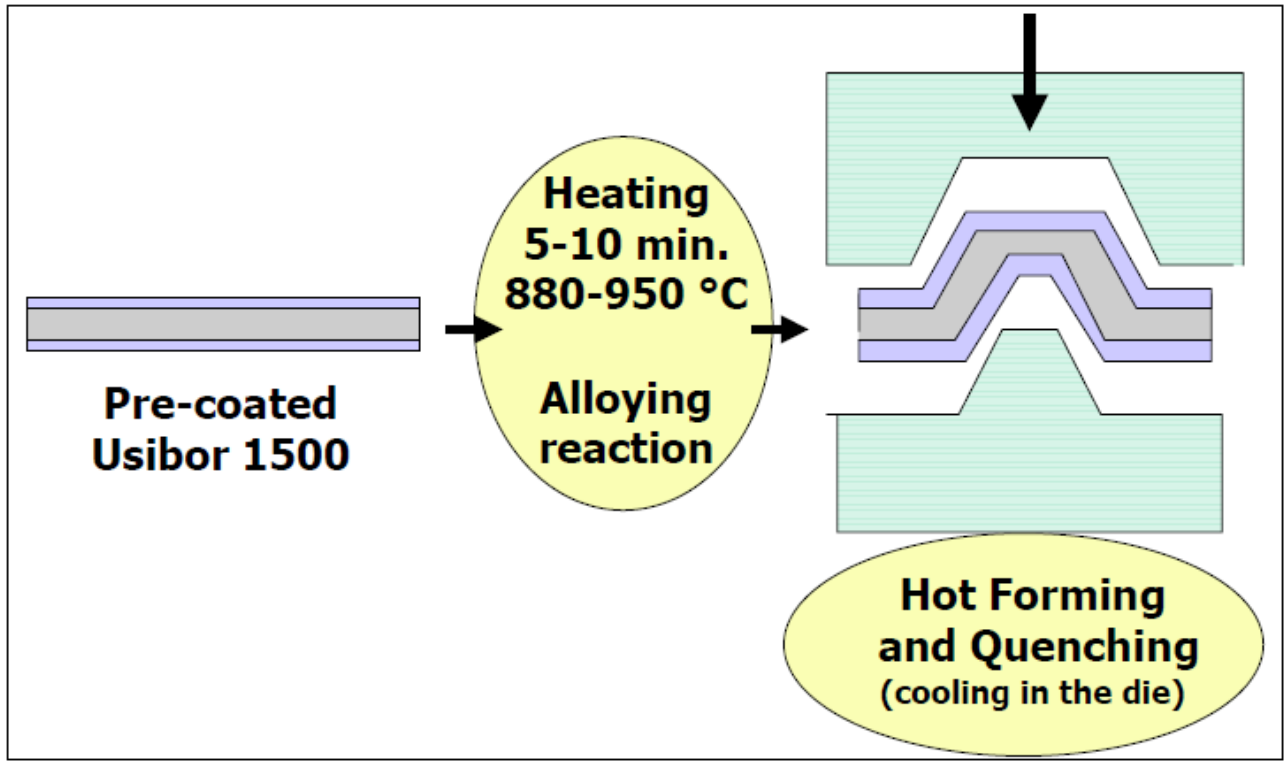


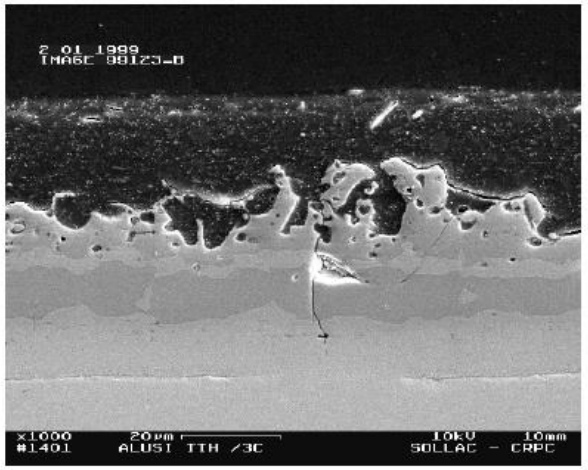
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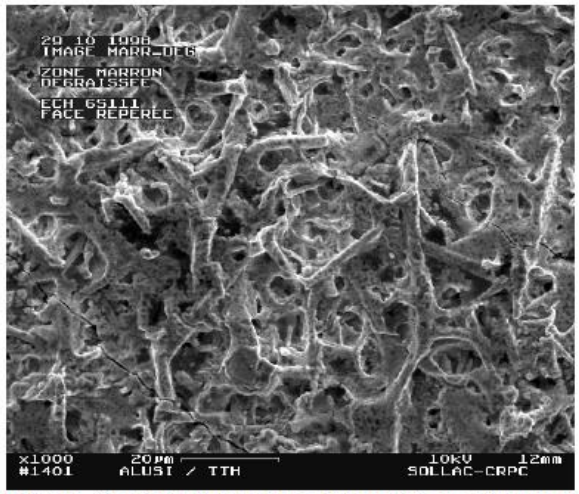


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Cornette at 9-10.

[1e] (a) an Interdiffusion layer,	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (a) an Interdiffusion layer. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

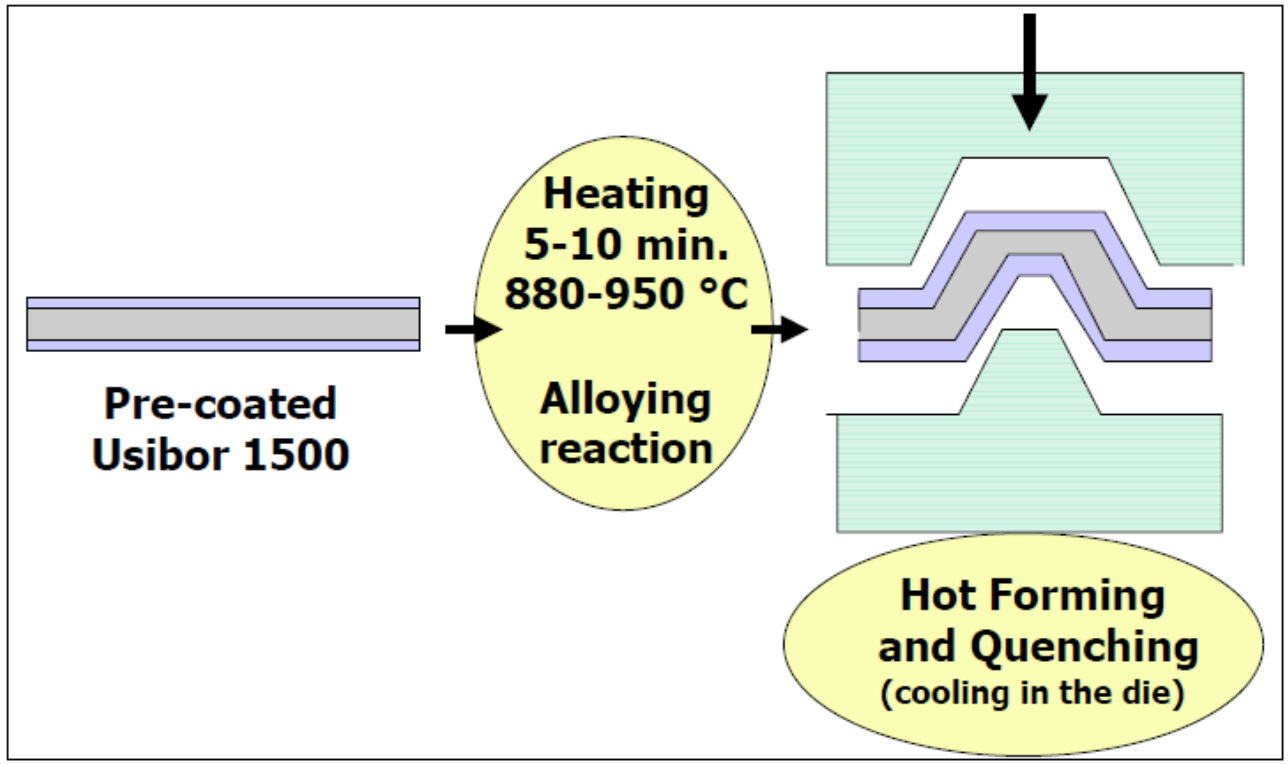


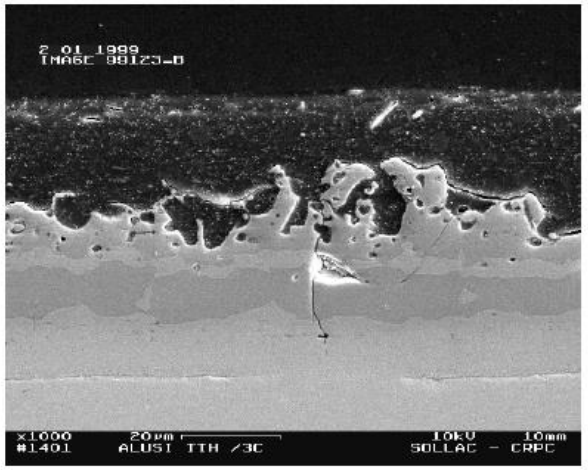
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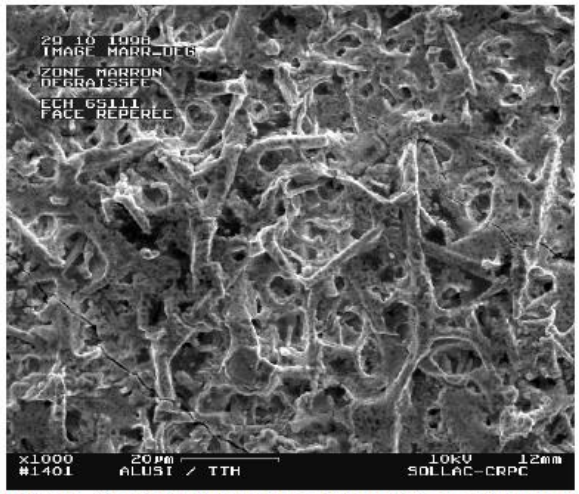


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Cornette at 9-10.

[1f] (b) an Intermediate layer,	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (b) an Intermediate layer. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

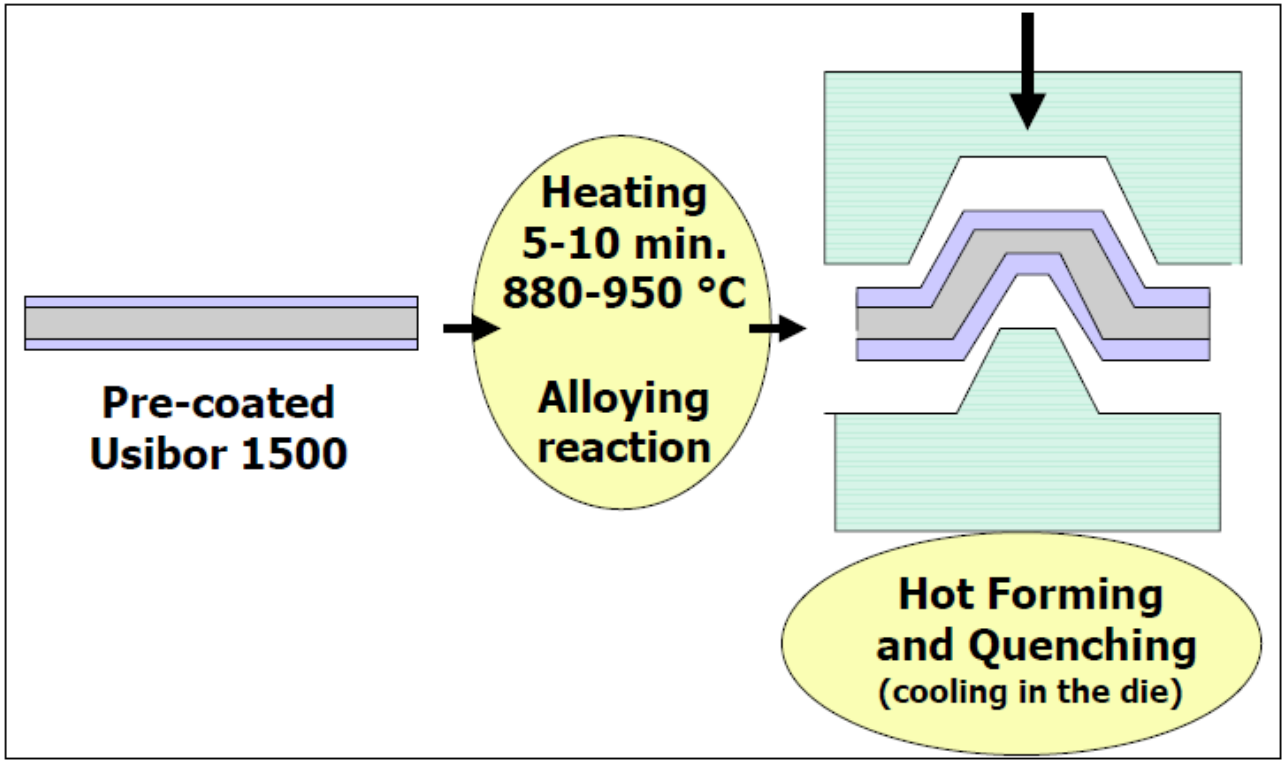


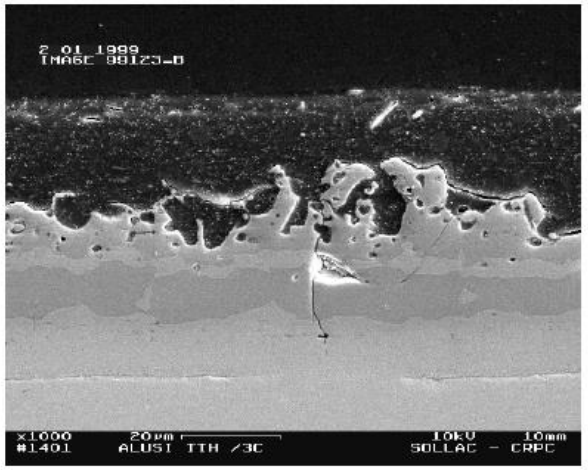
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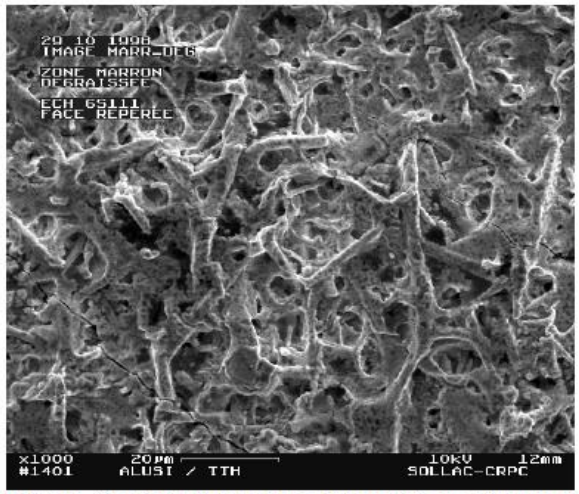


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Cornette at 9-10.

[1g] (c) an Intermetallic layer, 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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose (c) an Intermetallic layer. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

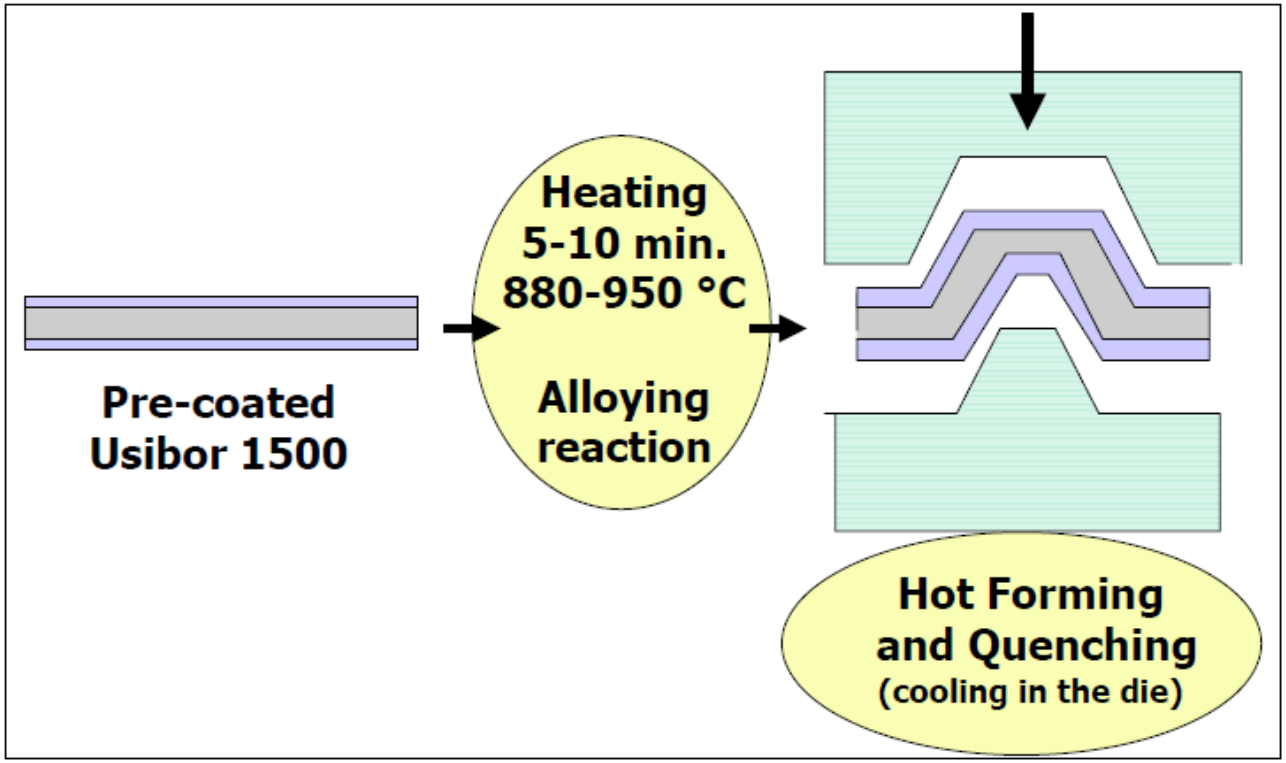


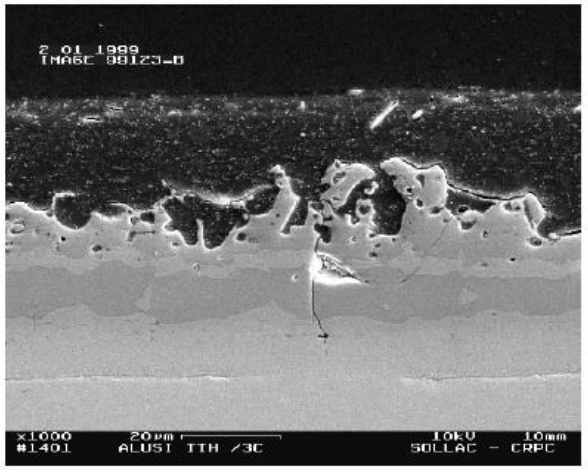
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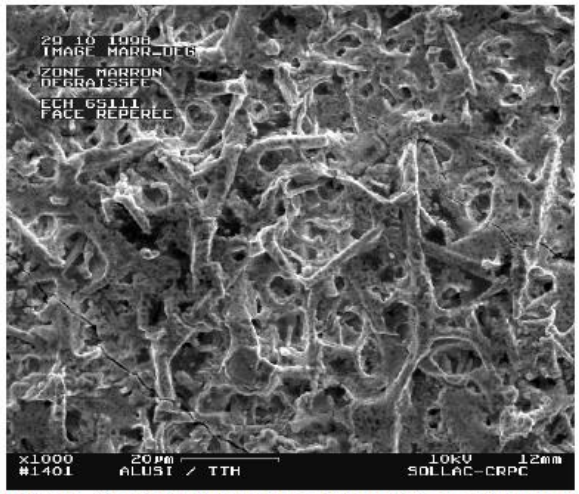


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Cornette at 9-10.

[1h] (d) a Superficial layer,	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose(d) a Superficial layer. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

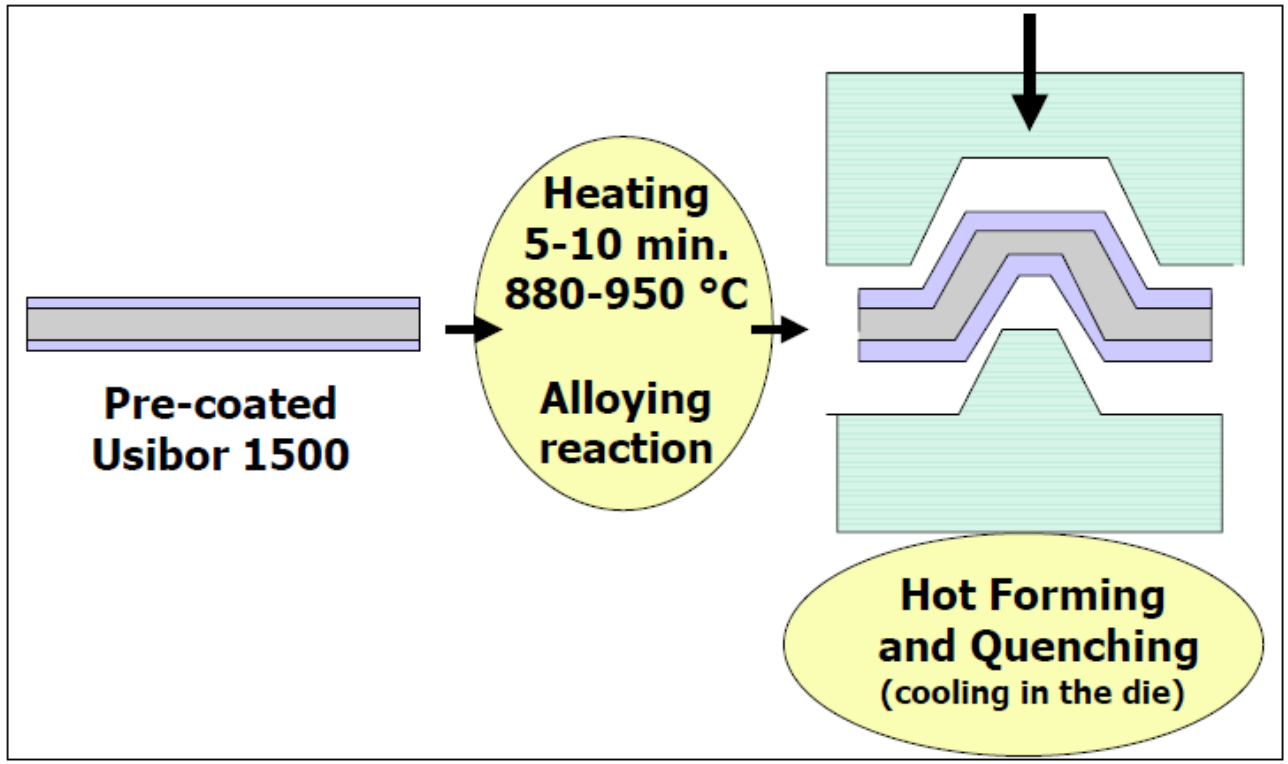


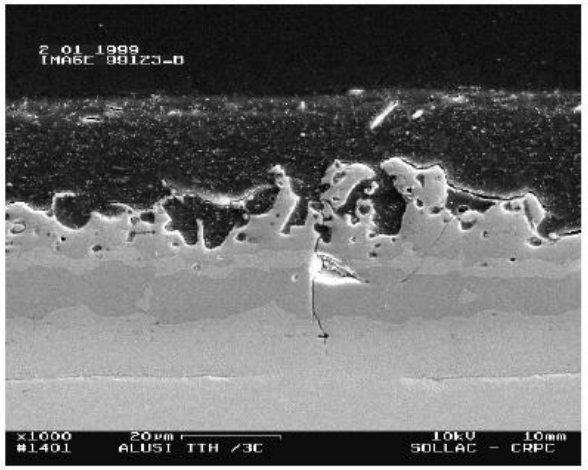
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Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



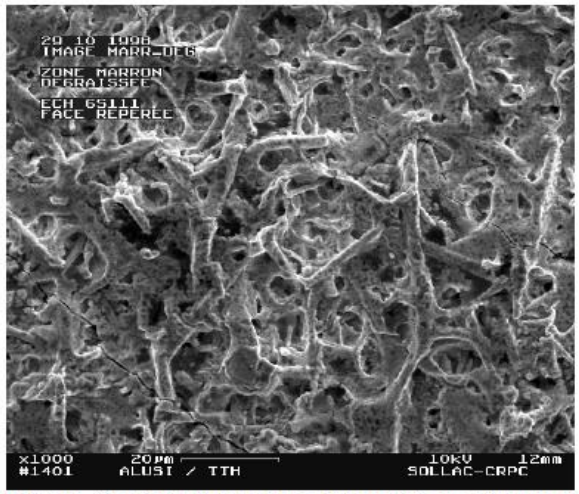


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

[1i] wherein layers (a), (b), (c), and (d) each have a different mean composition from one another,	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose wherein layers (a), (b), (c), and (d) each have a different mean composition from one another. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

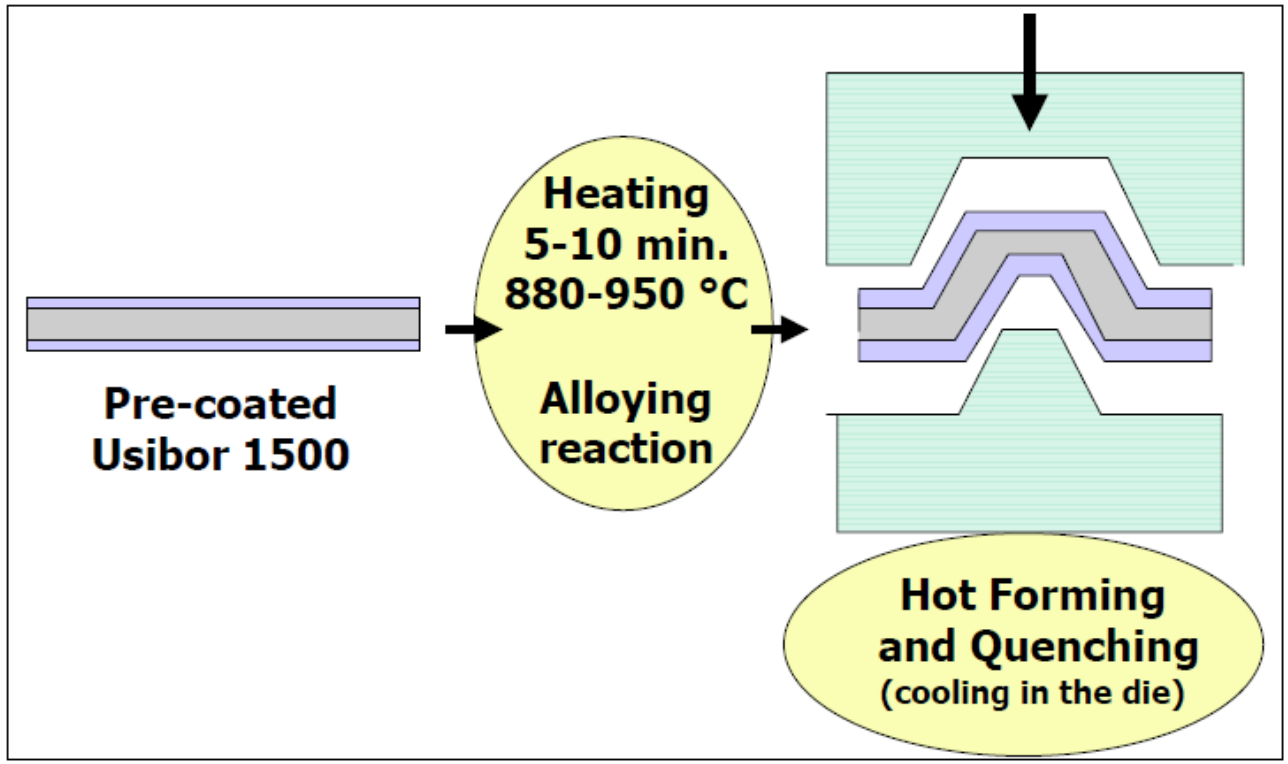


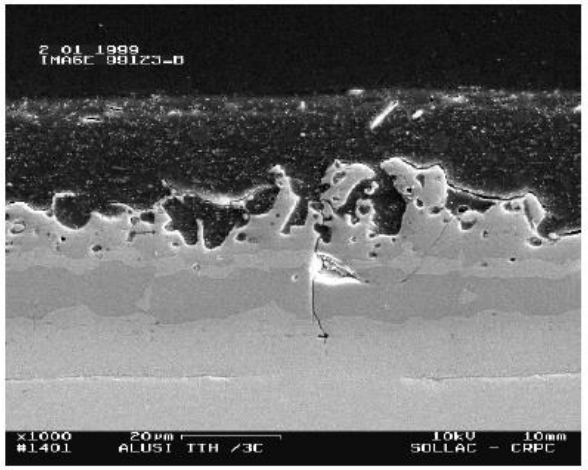
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



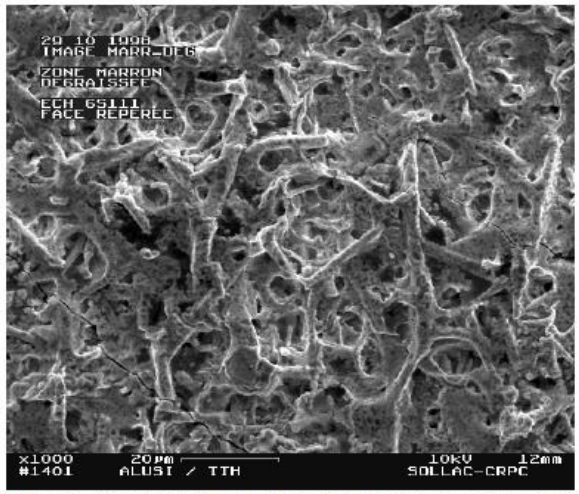


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

[1j] wherein said coating of the hot stamped coated steel product 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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose wherein said coating of the hot stamped coated steel product has a thickness greater than 30 micrometers. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

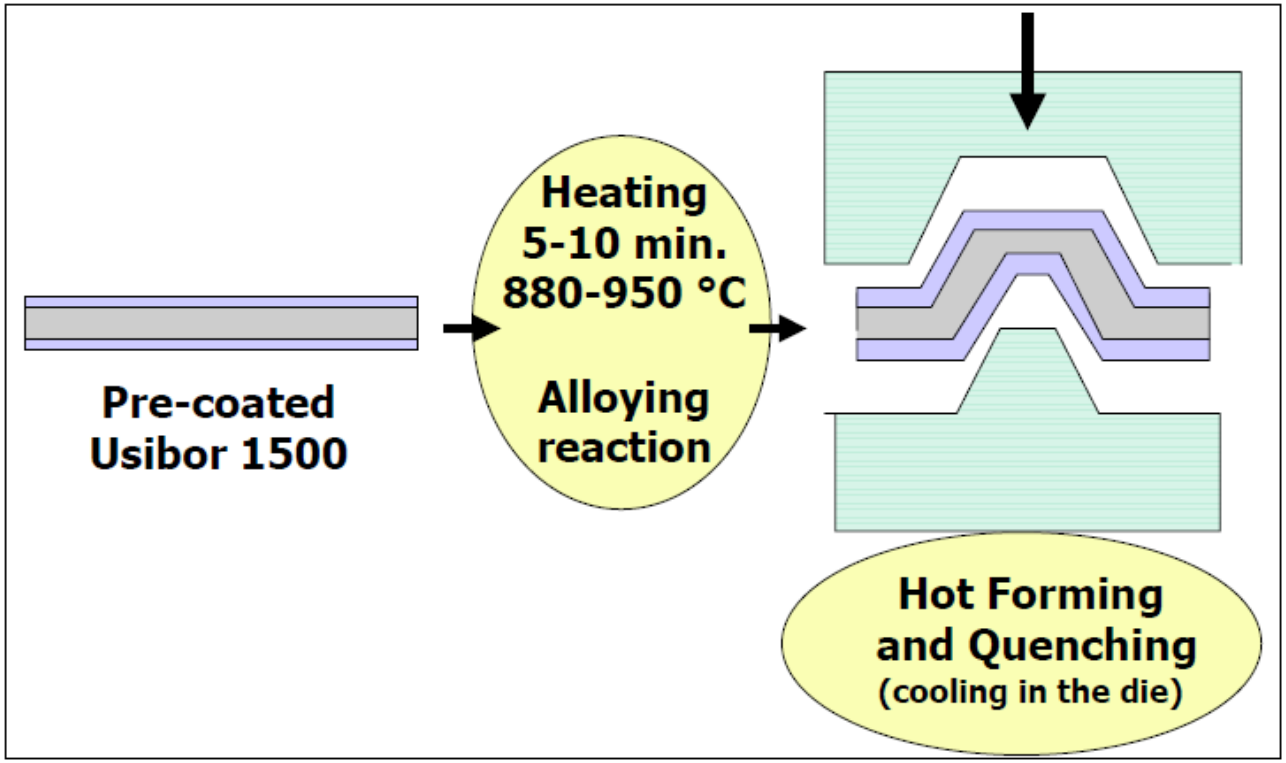


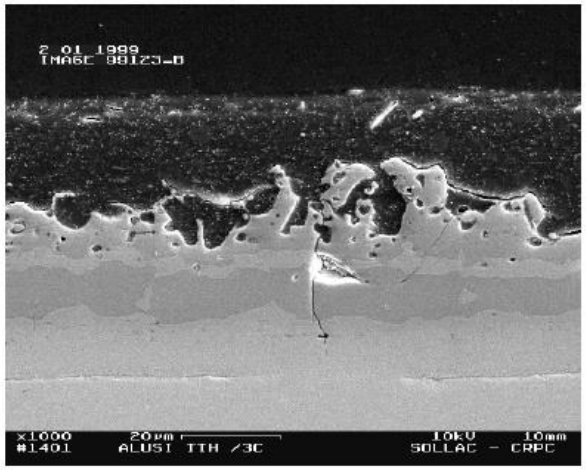
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

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Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



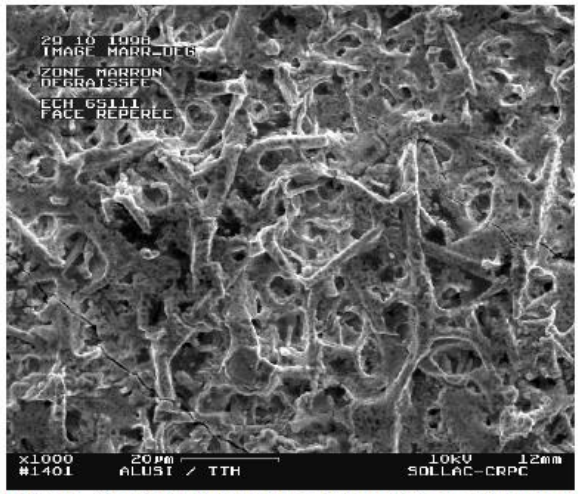


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 2

[2] The hot stamped coated steel product according to claim 1, wherein said layer (a) has a thickness that is less than half of said thickness of the coating.	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein said layer (a) has a thickness that is less than half of said thickness of the coating. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

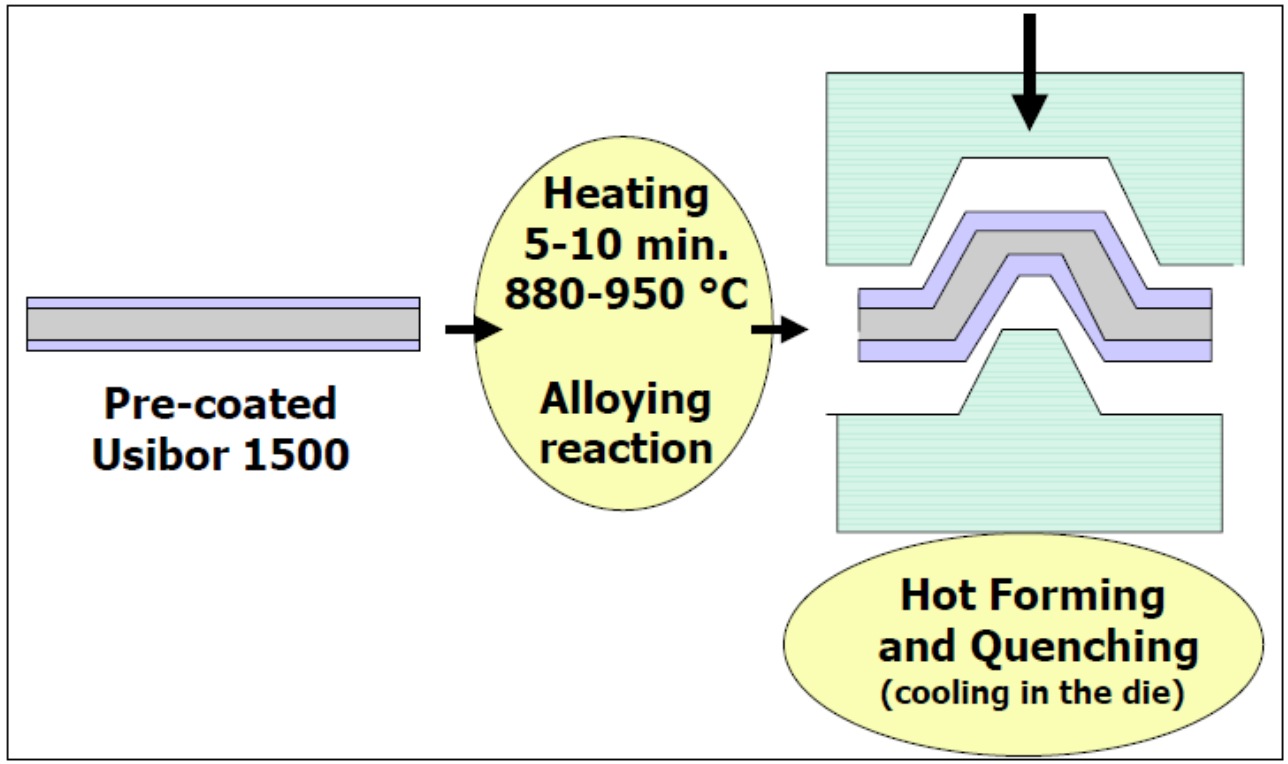


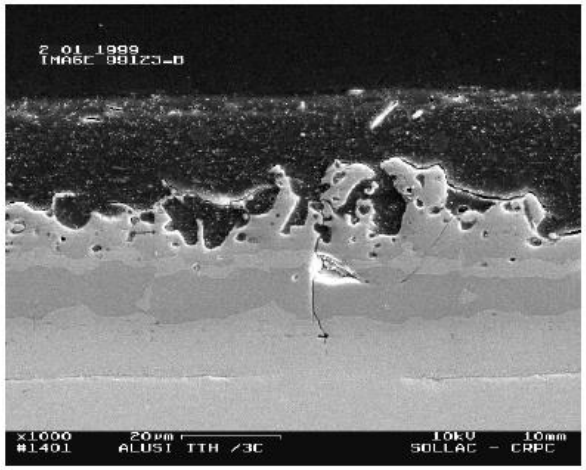
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



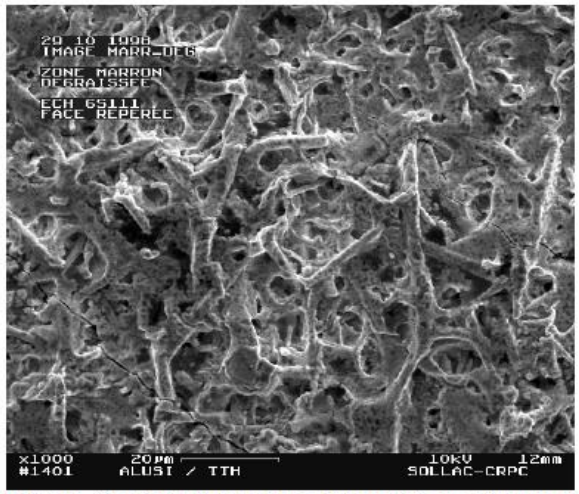


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 4

[4] The hot stamped coated steel product according to claim 1, wherein said layer (a) has a thickness of 17 micrometers or less.	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein said layer (a) has a thickness of 17 micrometers or less. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

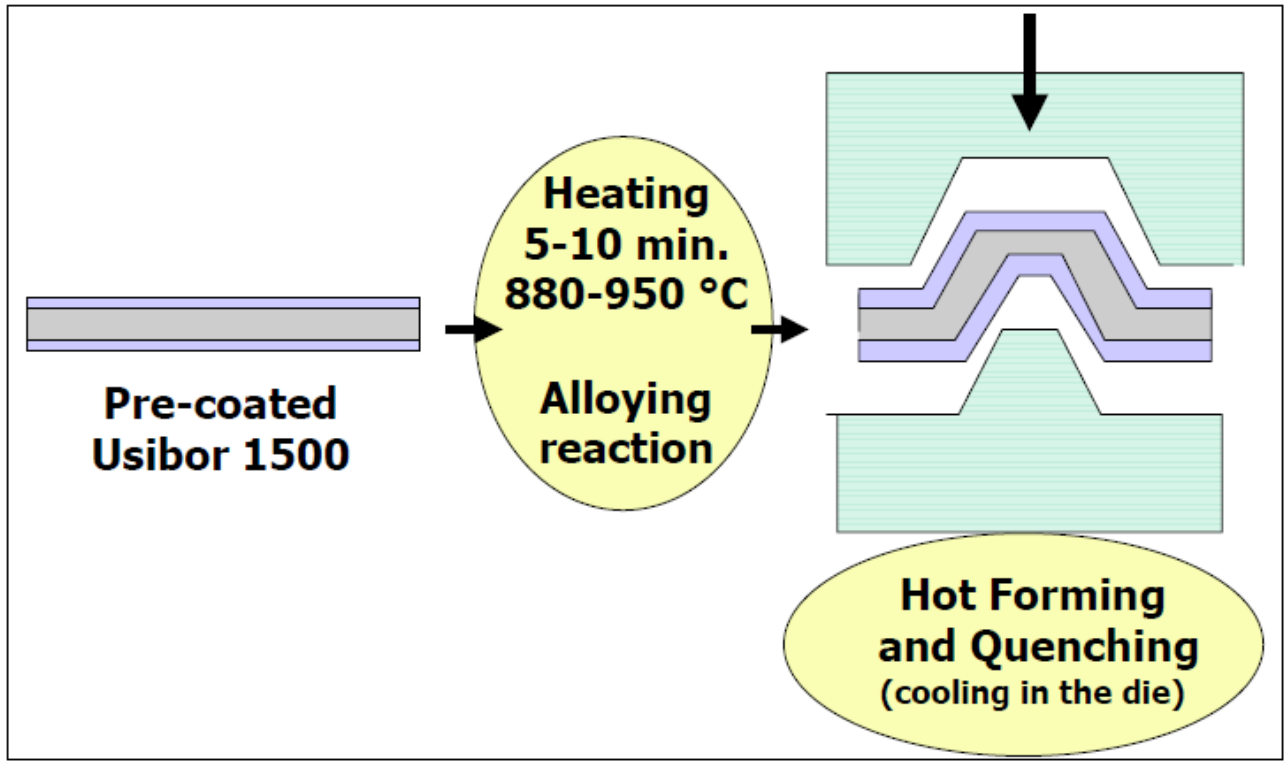


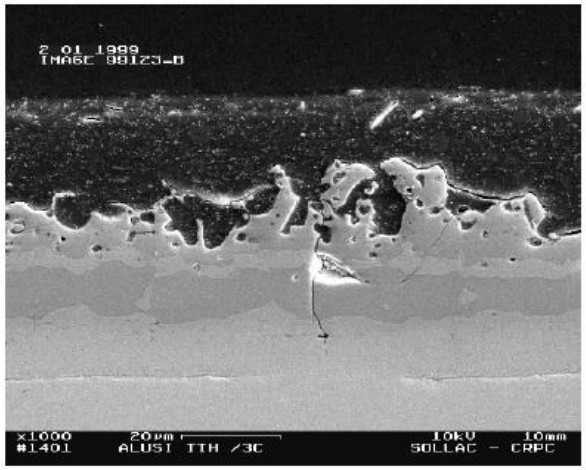
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



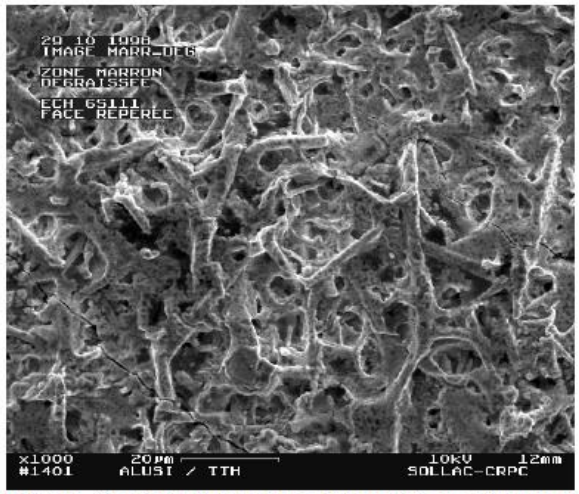


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 5

[5] The hot stamped coated steel product according to claim 1, wherein said layer (a) has a thickness of 15 micrometers or less.	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein said layer (a) has a thickness of 15 micrometers or less. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

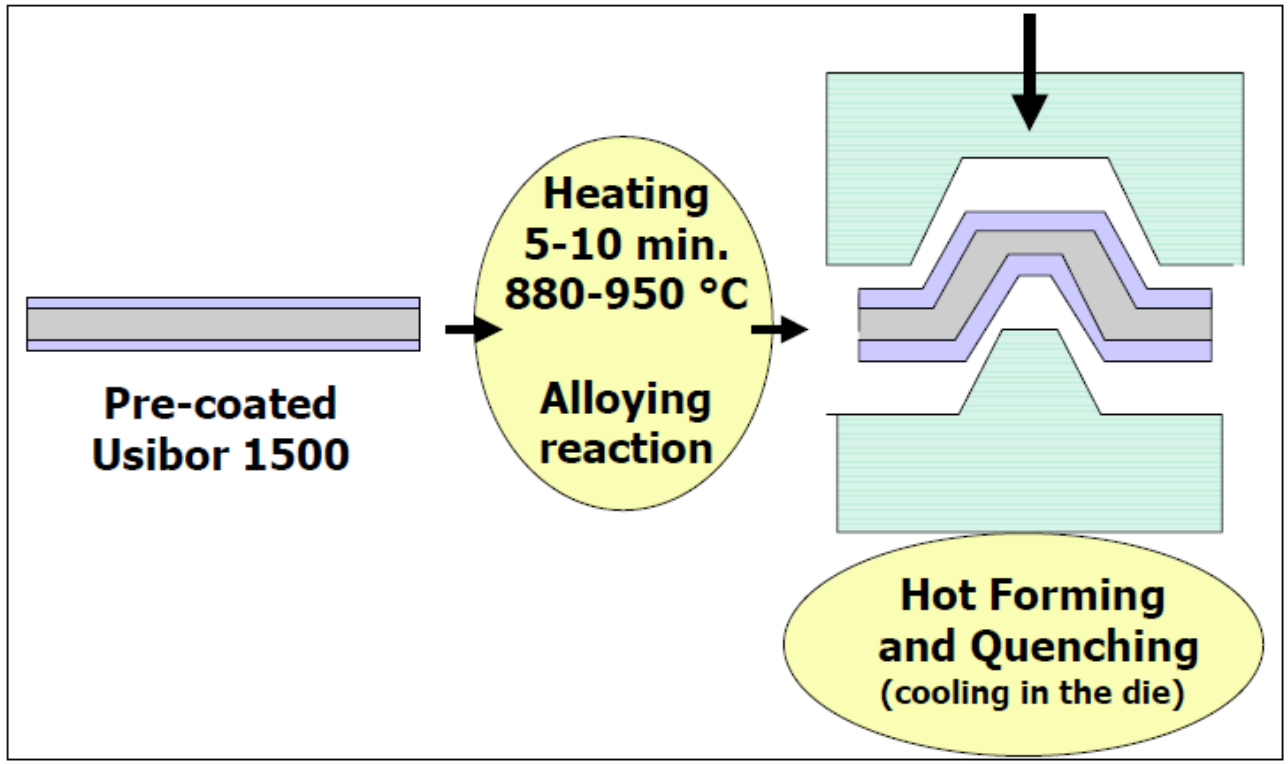


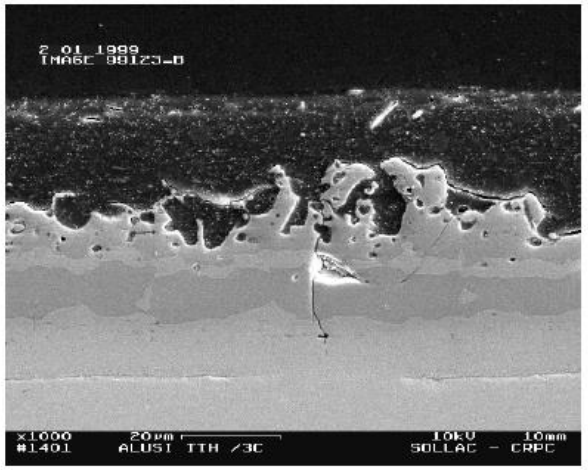
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"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



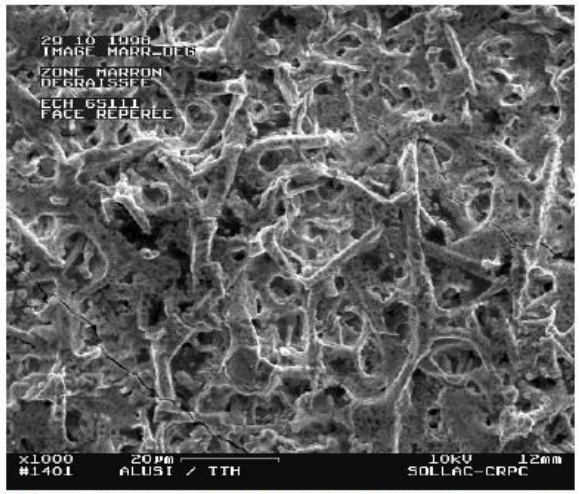


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 6

[6] The hot stamped coated steel product according to claim 4, wherein the coating is 40 micrometers thick.	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 4, wherein the coating is 40 micrometers thick. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

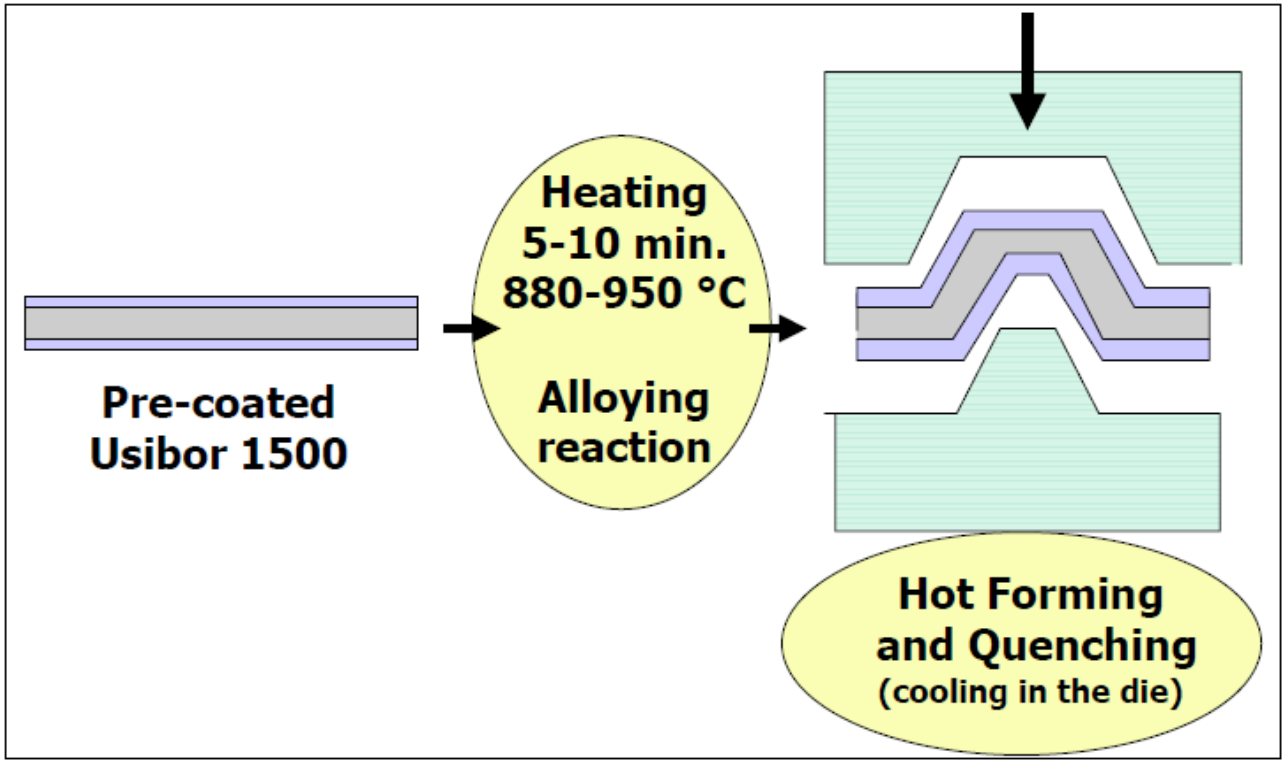


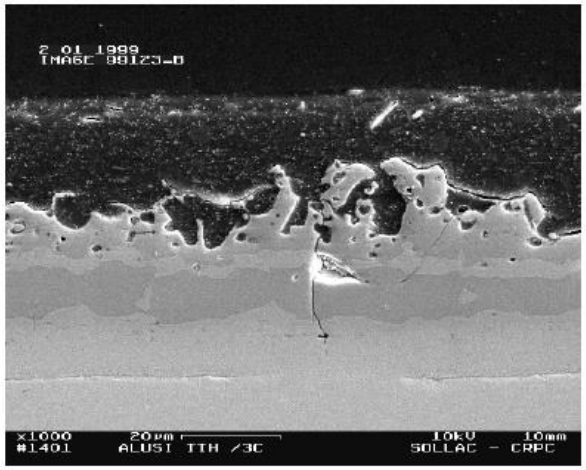
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USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



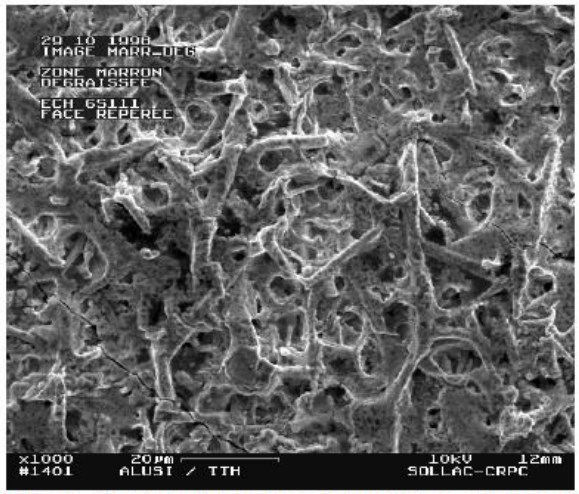


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 7

[7] The hot stamped coated steel product according to claim 1, wherein the interdiffusion layer has a first mean iron composition, the intermediate layer has a second mean iron composition less than the first mean iron composition; wherein the intermetallic layer has a third mean iron composition, the third mean iron composition less than the first mean iron composition and greater than the second mean iron composition, and the superficial layer has a fourth mean iron composition, the fourth mean iron composition begin less 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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the interdiffusion layer has a first mean iron composition, the intermediate layer has a second mean iron composition less than the first mean iron composition; wherein the intermetallic layer has a third mean iron composition, the third mean iron composition less than the first mean iron composition and greater than the second mean iron composition, and the superficial layer has a fourth mean iron composition, the fourth mean iron composition begin less than the third mean iron composition. For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

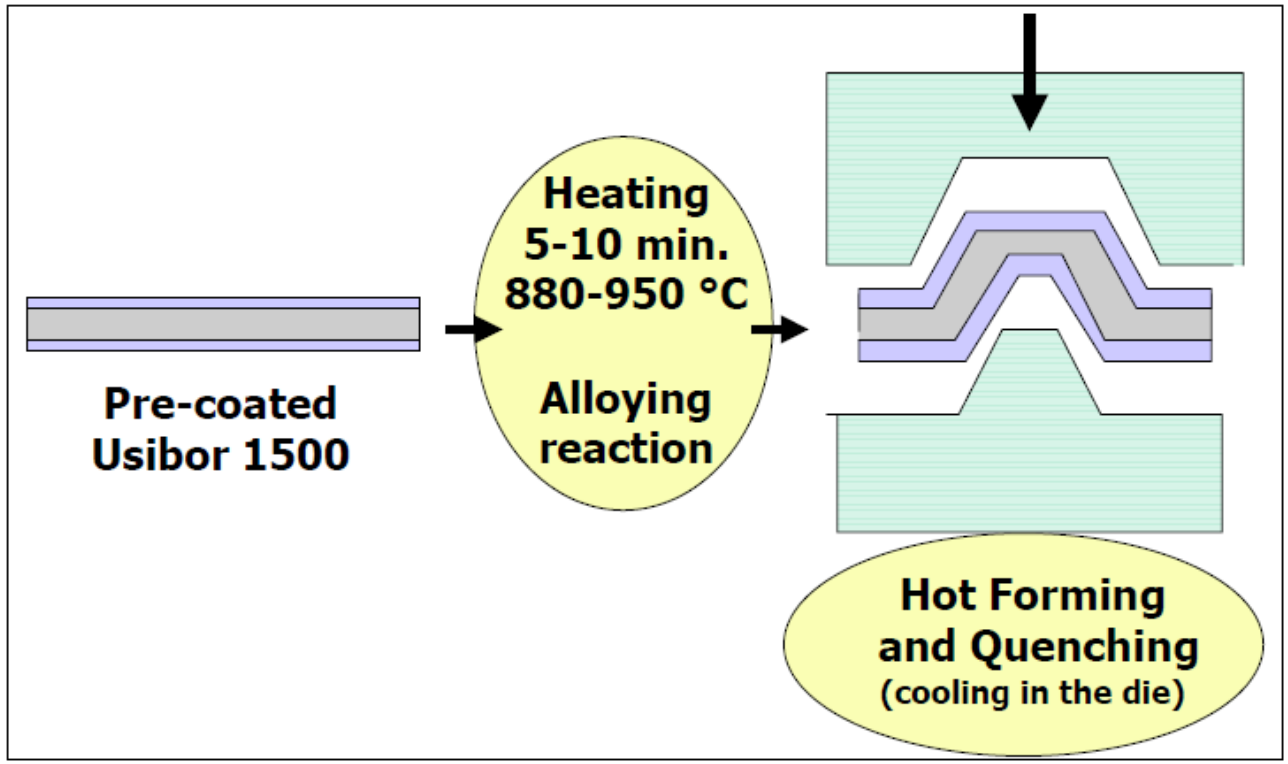


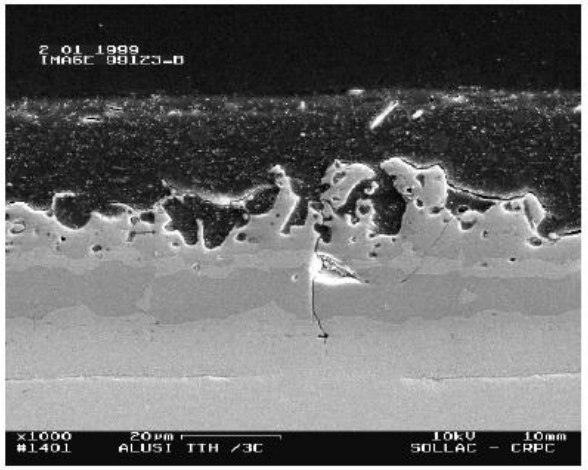
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Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



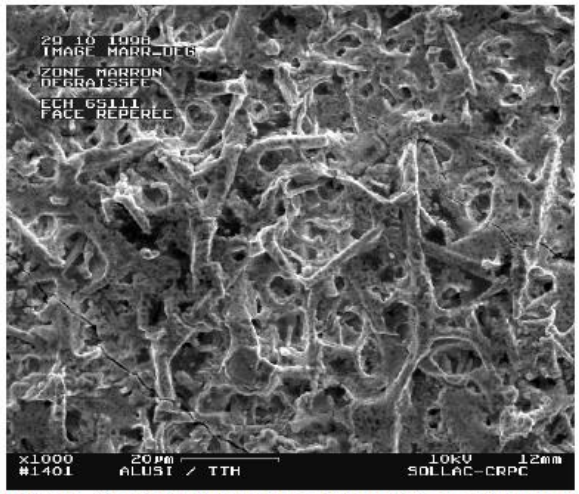


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 8

[8] The hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is greater than a thickness of layer (b).	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is greater than a thickness of layer (b). For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

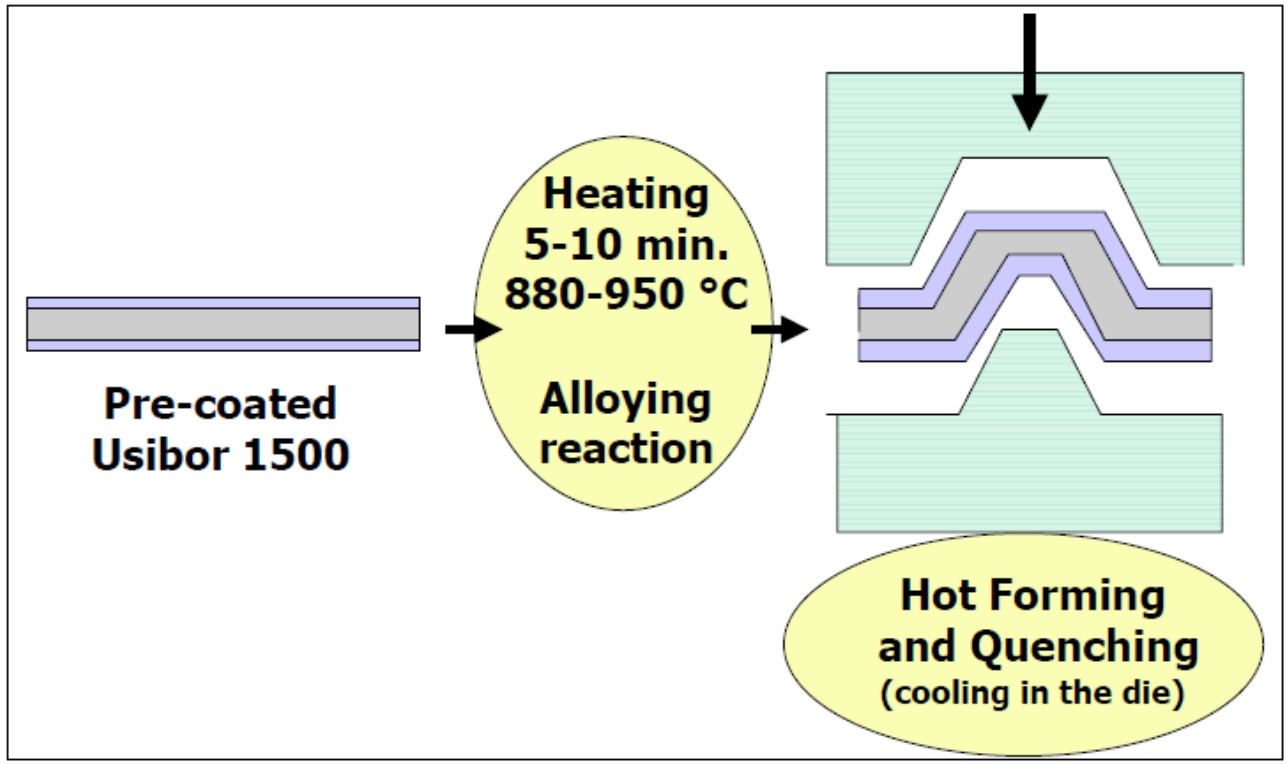


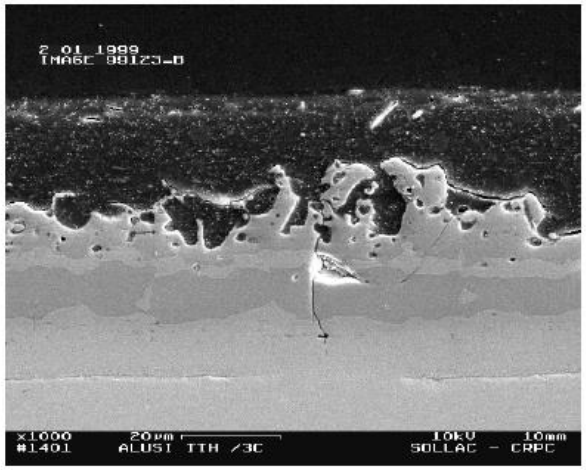
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Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



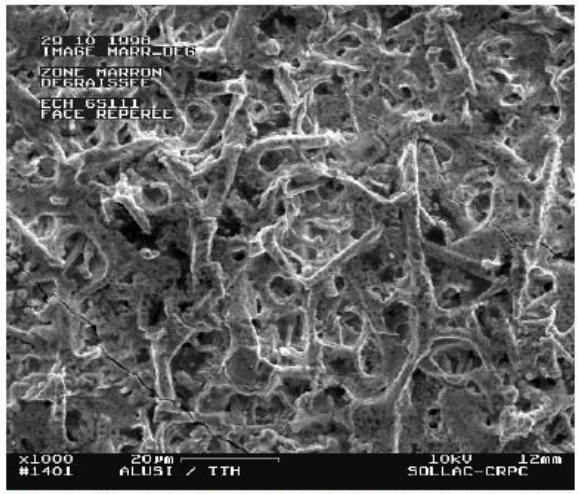


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 9

[9] The hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is greater than a thickness of layer (c).	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is greater than a thickness of layer (c). For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

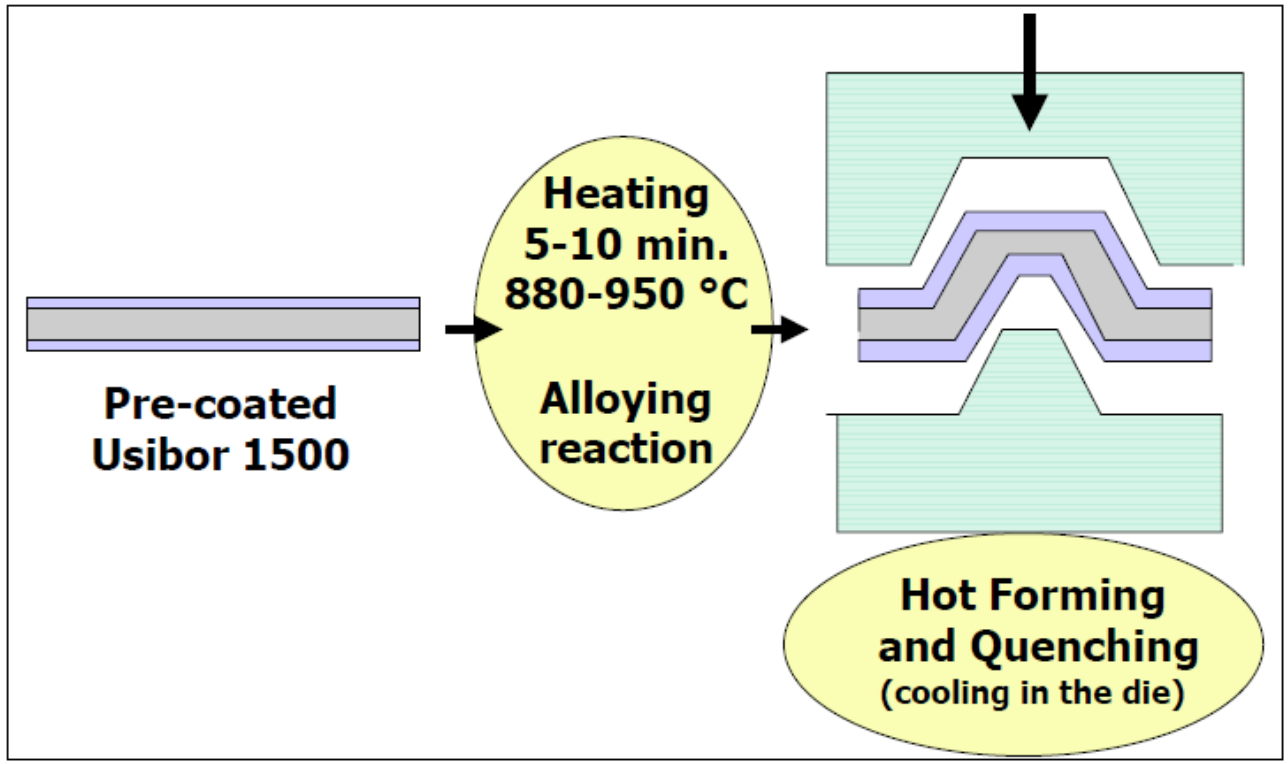


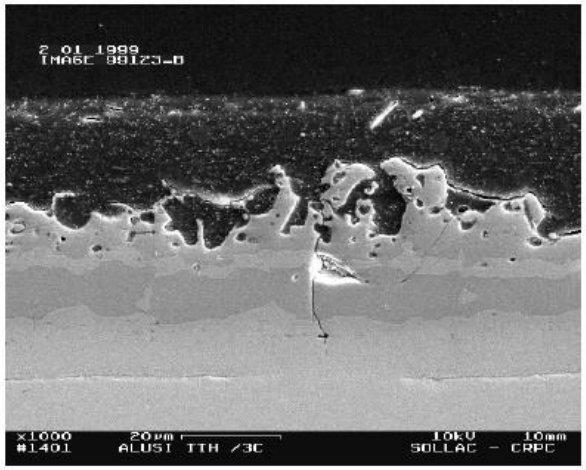
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



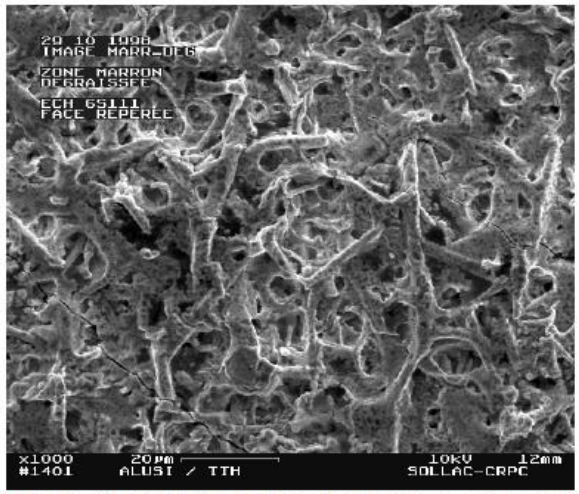


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 10

[10] The hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is greater than a thickness of layer (d).	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is greater than a thickness of layer (d). For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

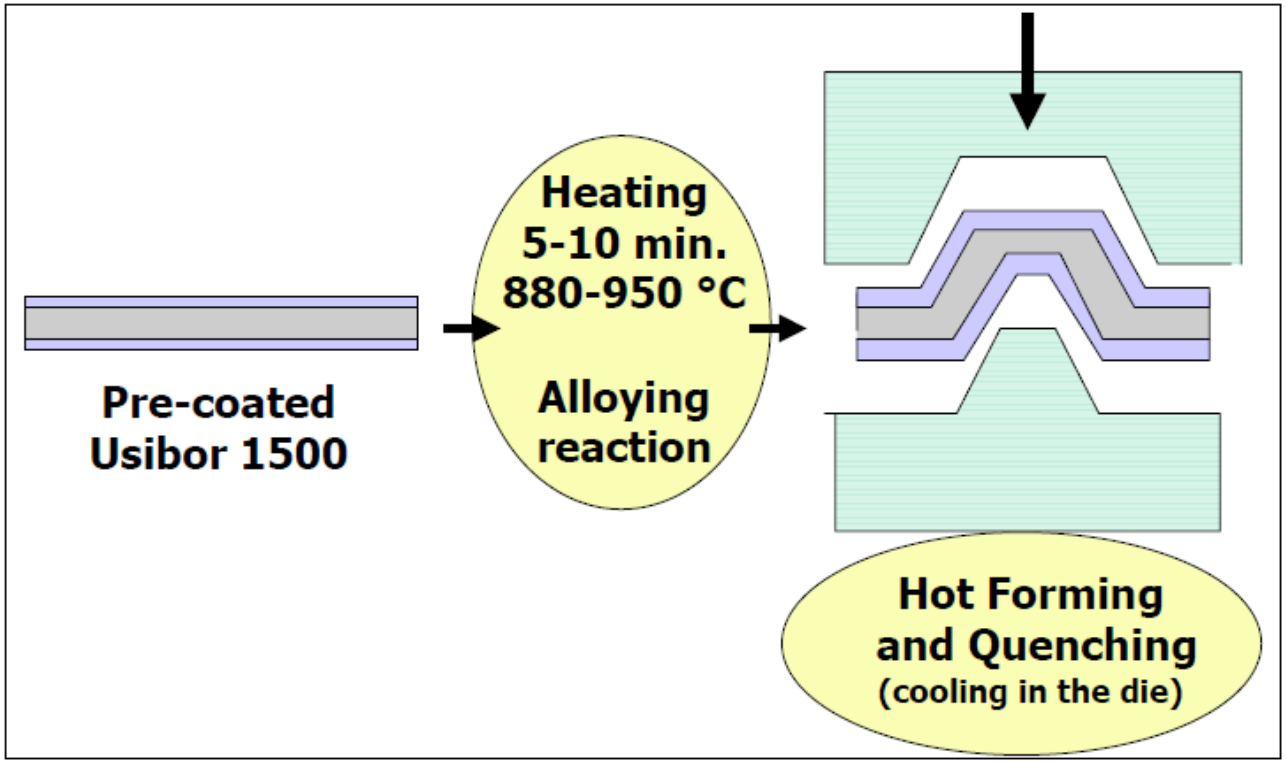


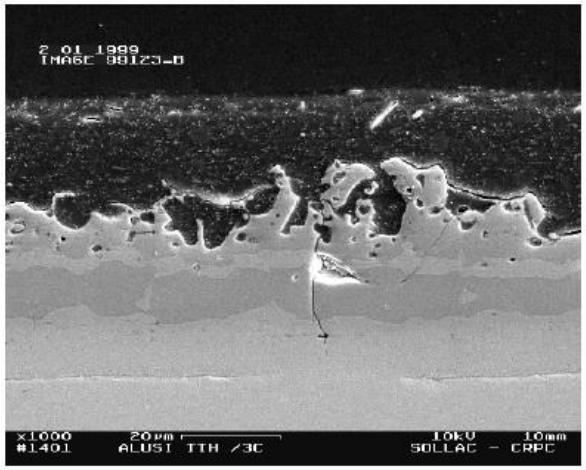
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

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USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



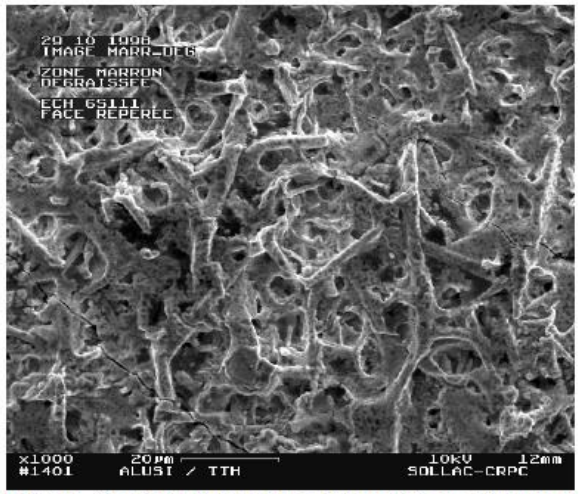


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 11

[11] The hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness: that is greater than a thickness of layer (b); that is greater than a thickness of layer (c); and that is greater than a thickness of layer (d).	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness: that is greater than a thickness of layer (b); that is greater than a thickness of layer (c); and that is greater than a thickness of layer (d). For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

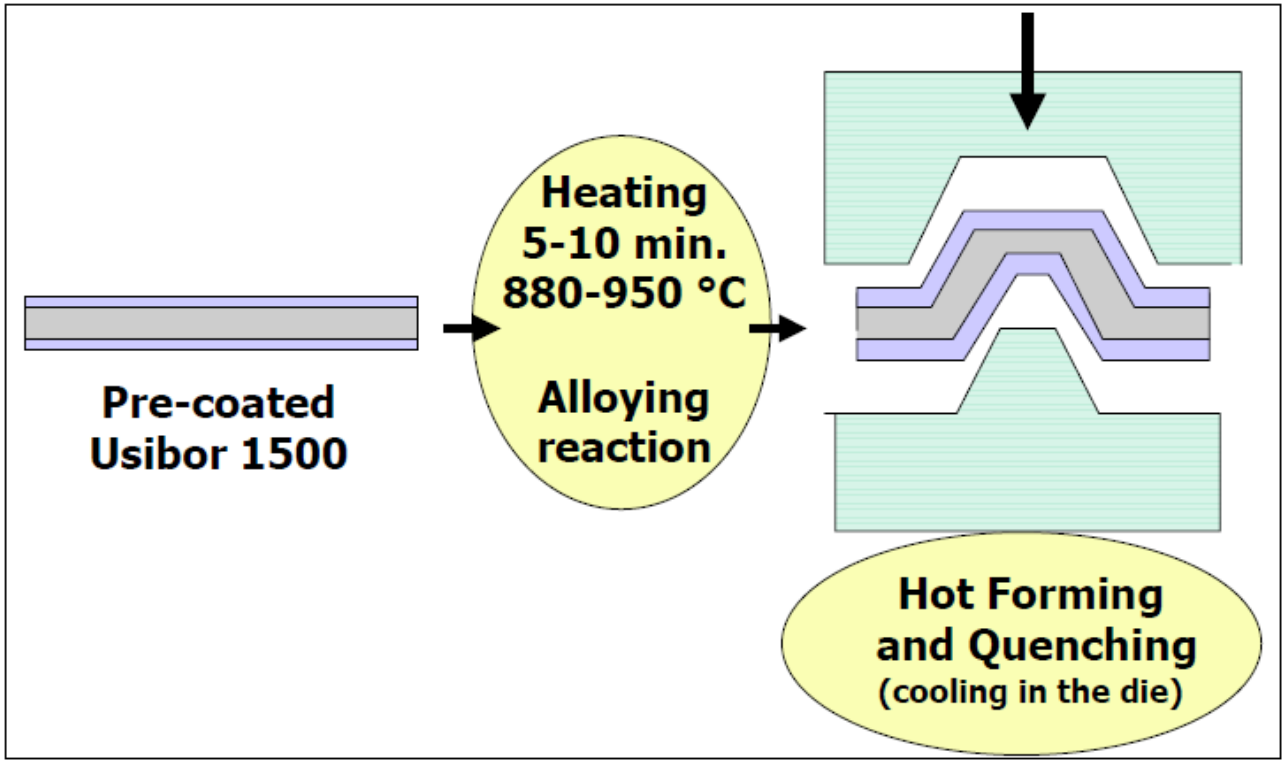


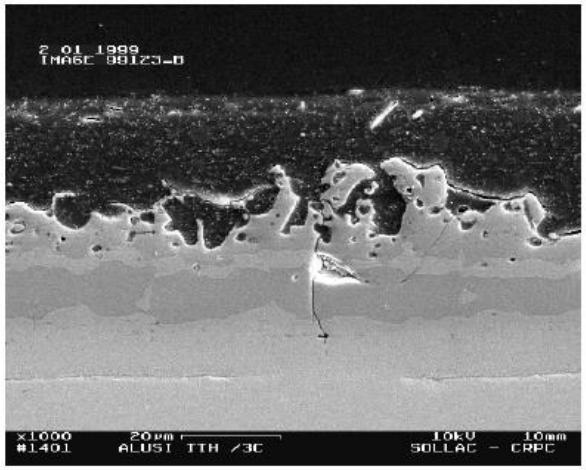
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



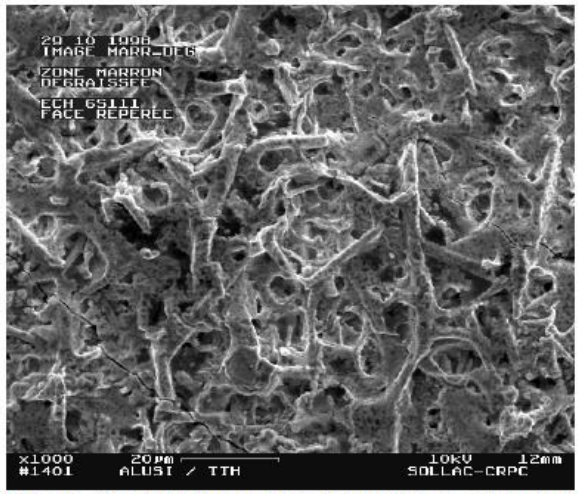


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 13

[13] The hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is more than twice a thickness of layer (c).	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' infringement contentions, which Respondents disagree with. Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein layer (a) has a thickness that is more than twice a thickness of layer (c). For example: "Another way to reduce weight and improve the safety is to separate the required characteristics, i.e. good formability and very high strength. The way to realize this objective is to use steel supplied with very good formability, permitting complex shapes to be obtained. In-use properties such as high mechanical characteristics are obtained through heat treatment or hot forming. Moreover, the lengthening of anti-corrosion guarantees requires pre-protected steel supply. In order to answer these requirements, USINOR has developed a pre-coated version of USIBOR [6] steel, which associate excellent mechanical properties of the material after the press hardening process with good corrosion protection." Cornette at 9.

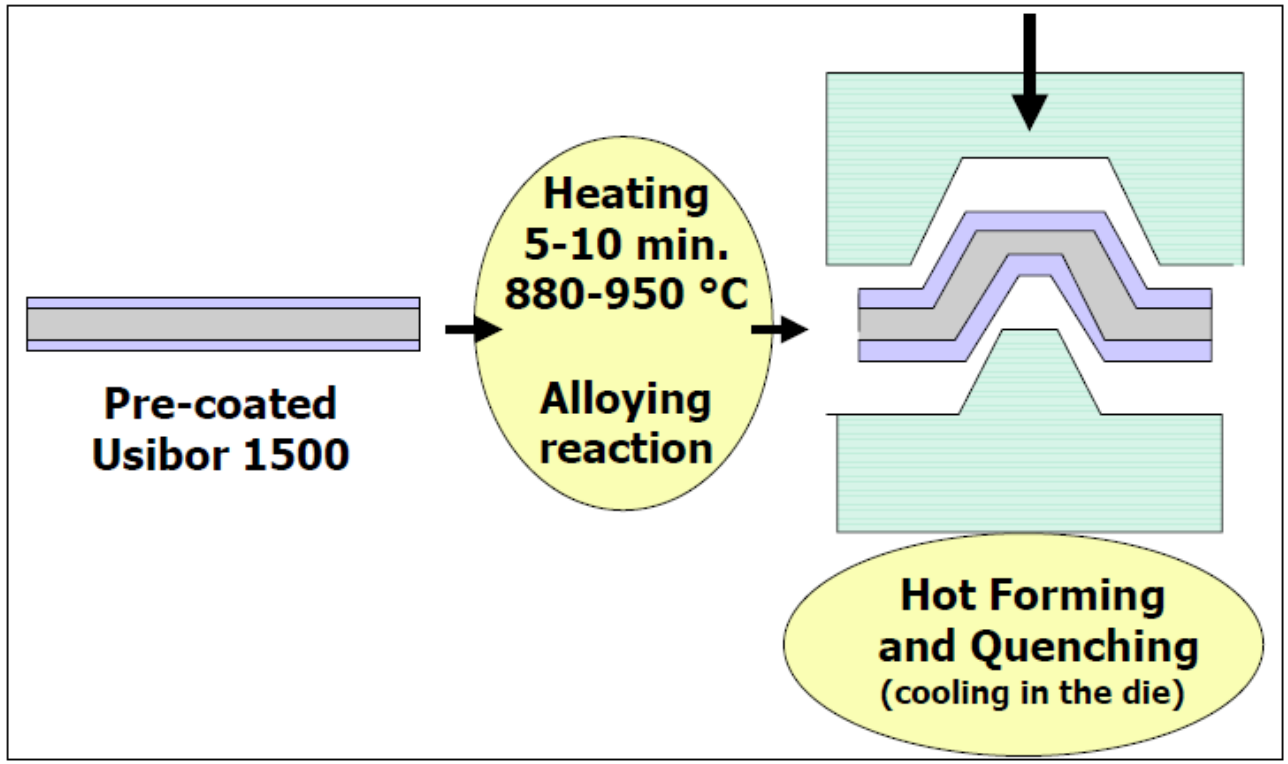


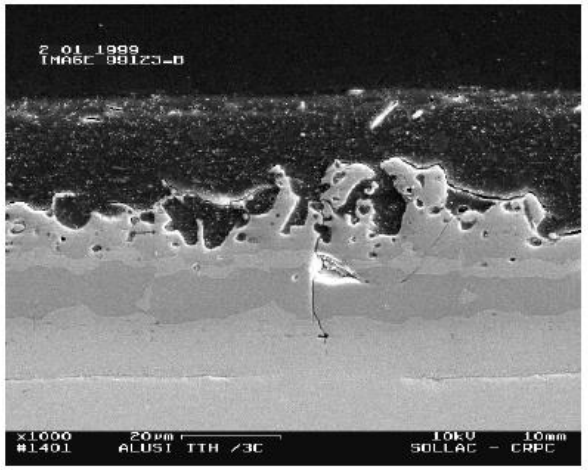
Fig. 21. Process used for the hot forming of USIBOR 1500 Pre-coated.

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.

Table III. Chemical composition of pre-coated boron steel in thousandths of percent

	C	Mn	Si	S	Cr	Al	B	Ti
Min.	200	1100	150		150	20	2	20
Max.	250	1350	350	8	300	60	4	50

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



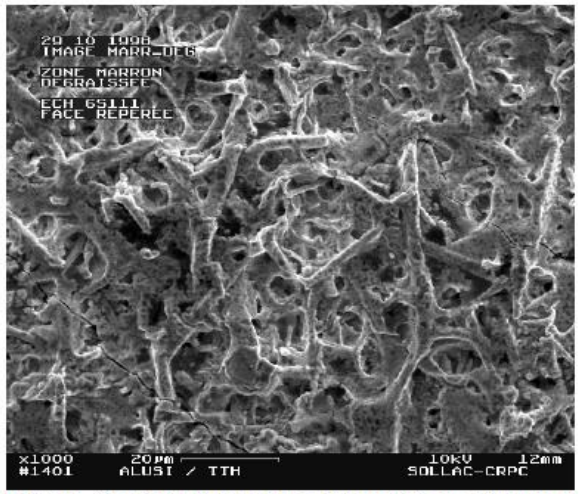


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 15

<table>
<tr><td>[15] The hot stamped coated steel product according to claim 1, wherein the hot stamped coated steel product is fully martensitic.</td><td>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' infringement contentions, which Respondents disagree with.

Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the hot stamped coated steel product is fully martensitic. For example:

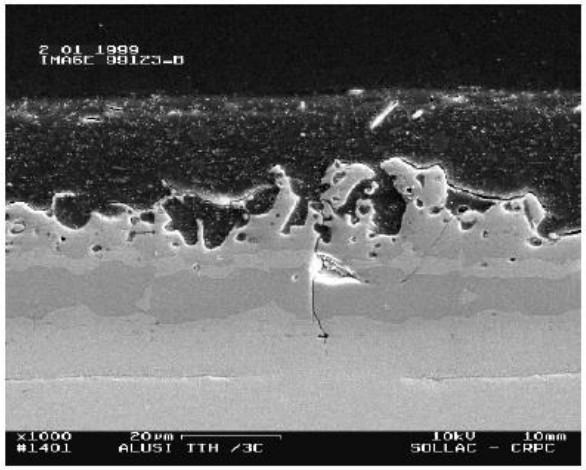
"Mechanical properties after hot forming process are not guarantied by USINOR. Following typical values are obtained after austenitization at 900°C during 5 minutes and cooling in the die, for a material with a thickness of 1,5 mm:
<table><tr><td>ISO 20x80 type</td><td>YS (MPa)</td><td>UTS (MPa)</td><td>E (%)</td></tr><tr><td>pre-coated boron steel</td><td>1030</td><td>1510</td><td>5</td></tr></table>The Al-Si coating does not significantly alter the heating process (heating speed temperature, dwell time) before forming nor the quenching speed in cooled tools." Cornette at 10.</td></tr>
<tr><td colspan="2">Claim 16</td></tr>
<tr><td>[16] The hot stamped coated steel product according to claim 1, wherein the base steel consists of 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%;</td><td>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' infringement contentions, which Respondents disagree with.

Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the base steel consists of 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%;</td></tr>
</table>

<table>
<tr>
<td>phosphorus<0.1%;
sulfur<0.05%;
0.0005%<boron<0.08%;
a remainder being iron and impurities inherent in processing.</td>
<td>phosphorus<0.1%;
sulfur<0.05%;
0.0005%<boron<0.08%;
a remainder being iron and impurities inherent in processing. For example:

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.
Table III. Chemical composition of pre-coated boron steel in thousandths of percent
<table>
<tr><th></th><th>C</th><th>Mn</th><th>Si</th><th>S</th><th>Cr</th><th>Al</th><th>B</th><th>Ti</th></tr>
<tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr>
<tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr>
</table>

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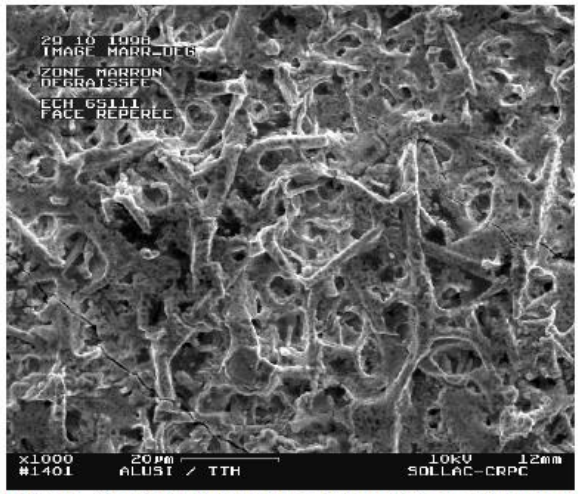


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 17

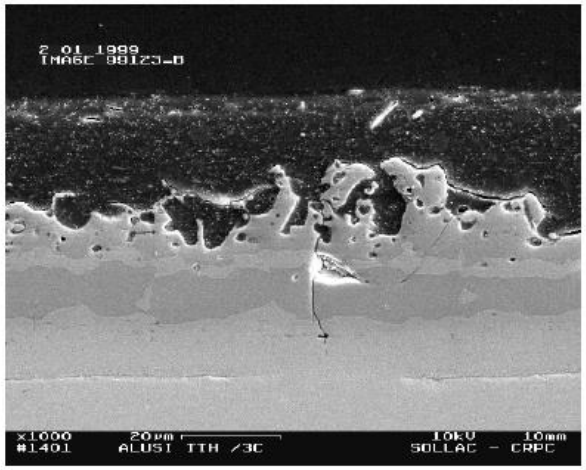
<table>
<tr>
<td>[17] The hot stamped coated steel product according to claim 1, wherein the base steel consists of the following components by weight based on total weight:
0.15%<carbon<0.25%,
0.8%<manganese<1.8%,
0.10%<silicon<0.35%,
0.01%<chromium<0.5%,
titanium<0.1%
aluminum<0.1%
phosphorus<0.1%
sulfur<0.05%
0.002%<boron<0.005%,
a remainder being iron and impurities inherent in processing.</td>
<td>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' infringement contentions, which Respondents disagree with.

Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the base steel consists of the following components by weight based on total weight:
0.15%<carbon<0.25%,
0.8%<manganese<1.8%,
0.10%<silicon<0.35%,
0.01%<chromium<0.5%,
titanium<0.1%
aluminum<0.1%
phosphorus<0.1%
sulfur<0.05%
0.002%<boron<0.005%,
a remainder being iron and impurities inherent in processing. For example:

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.
Table III. Chemical composition of pre-coated boron steel in thousandths of percent
<table>
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<tr><td>Min.</td><td>200</td><td>1100</td><td>150</td><td></td><td>150</td><td>20</td><td>2</td><td>20</td></tr>
<tr><td>Max.</td><td>250</td><td>1350</td><td>350</td><td>8</td><td>300</td><td>60</td><td>4</td><td>50</td></tr>
</table>

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



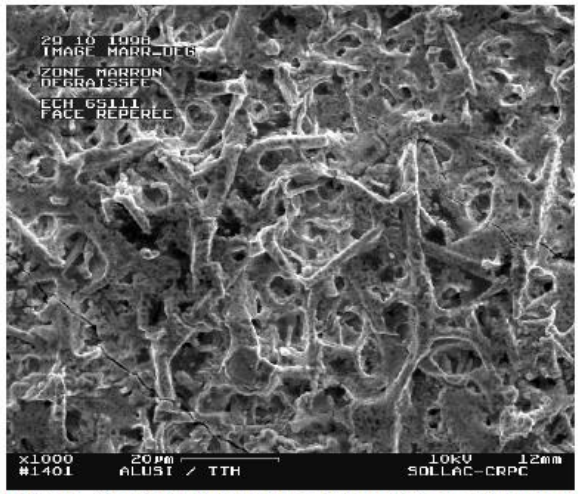


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

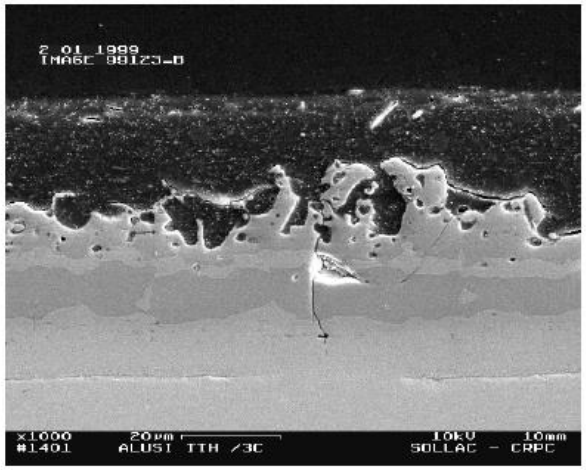
Claim 22

<table>
<tr>
<td>[22] The hot stamped coated steel product according to 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.</td>
<td>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' infringement contentions, which Respondents disagree with.

Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the Intermediate layer comprises the following components by weight based on total weight: 39 to 47% Fe, 53 to 61% Al, and 0 to 2% Si. For example:

"CHEMICAL COMPOSITION OF THE BASE MATERIAL
USIBOR 1500 is a carbon-manganese steel microalloyed with boron." Cornette at 9.
Table III. Chemical composition of pre-coated boron steel in thousandths of percent
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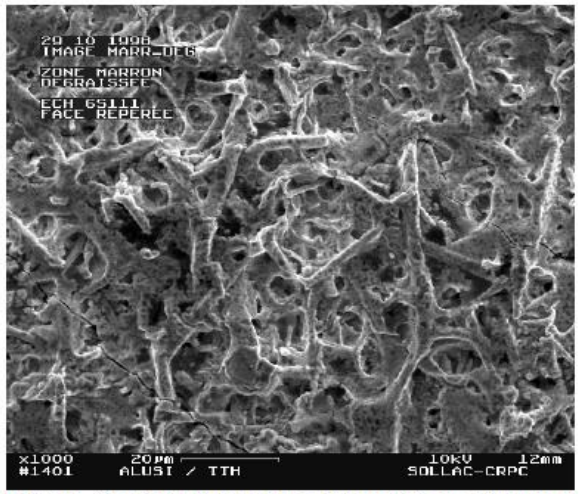


Fig. 22. Section view and coating surface after heat treatment. "

Cornette at 9-10.

Claim 24

<table>
<tr><td>[24] The hot stamped coated steel product according to claim 1, wherein the hot stamped coated steel product has a mechanical strength in excess of 1000 MPa.</td><td>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' infringement contentions, which Respondents disagree with.

Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the hot stamped coated steel product has a mechanical strength in excess of 1000 MPa. For example:

"Mechanical properties after hot forming process are not guarantied by USINOR. Following typical values are obtained after austenitization at 900°C during 5 minutes and cooling in the die, for a material with a thickness of 1,5 mm:
<table><tr><td>ISO 20x80 type</td><td>YS (MPa)</td><td>UTS (MPa)</td><td>E (%)</td></tr><tr><td>pre-coated boron steel</td><td>1030</td><td>1510</td><td>5</td></tr></table>
The Al-Si coating does not significantly alter the heating process (heating speed temperature, dwell time) before forming nor the quenching speed in cooled tools." Cornette at 10.</td></tr>
<tr><td colspan="2">Claim 25</td></tr>
<tr><td>[25] The hot stamped coated steel product according to claim 1, wherein the hot stamped coated steel product has a mechanical strength in excess of 1500 MPa.</td><td>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' infringement contentions, which Respondents disagree with.

Cornette and/or one or more prior art references disclose the hot stamped coated steel product according to claim 1, wherein the hot stamped coated steel product has a mechanical strength in excess of 1500 MPa. For example:

"Mechanical properties after hot forming process are not guarantied by USINOR. Following typical values are obtained after austenitization at 900°C during 5 minutes and cooling in the die, for a material with a thickness of 1,5 mm:</td></tr>
</table>

	<table><tr><td>ISO 20x80 type</td><td>YS (MPa)</td><td>UTS (MPa)</td><td>E (%)</td></tr><tr><td>pre-coated boron steel</td><td>1030</td><td>1510</td><td>5</td></tr></table> The Al-Si coating does not significantly alter the heating process (heating speed temperature, dwell time) before forming nor the quenching speed in cooled tools." Cornette at 10.