

DECLARATION OF LAWRENCE E. CARLSON
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,968,884 B2

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NORMAN INTERNATIONAL, INC.

Petitioner

v.

HUNTER DOUGLAS, INC.

Patent Owner

CASE: Unassigned

Patent No. 6,968,884 B2

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I. INTRODUCTION

1. My name is Lawrence E. Carlson, and I am a Professor Emeritus of Mechanical Engineering at the University of Colorado in Boulder, Colorado. I am also an independent consultant on various matters involving mechanical engineering.

2. I have been engaged by Norman International, Inc. (“Norman”) to investigate and opine on certain issues relating to U.S. Patent No. 6,968,884 B2 entitled “MODULAR TRANSPORT SYSTEM FOR COVERINGS FOR ARCHITECTURAL OPENINGS” (“884 Patent”).

3. I understand that, according to the first page of the 884 Patent, the 884 Patent was assigned to Hunter Douglas Inc. Hunter Douglas Inc. is therefore referred to as the “Patent Owner” in this document.

4. In this declaration, I will discuss the technology related to the 884 Patent, including an overview of that technology as it was known at the time of the earliest priority date of the 884 Patent, which is March 23, 1999 according to Norman’s counsel. This overview of the relevant technology provides some of the bases for my opinions with respect to the 884 Patent.

5. This declaration is based on the information currently available to me. To the extent that additional information becomes available, I reserve the right to

continue my investigation and study, which may include a review of documents and information that may be produced, as well as testimony from depositions that may not yet be taken.

6. In forming my opinions, I have relied on information and evidence identified in this declaration, including the 884 Patent, the prosecution history of the 884 Patent, and prior art references including U.S. Patent No. 6,056,036 (“Todd”), U.S. Patent No. 3,327,765 (“Strahm”), U.S. Patent No. 5,531,257 (“Kuhar”), U.S. Patent No. 3,216,528 (“Lohr”) and U.S. Patent No. 5,641,229 (“McClintock”) listed as Exhibits to the Petition for *Inter Partes* Review of the 884 Patent. I have also relied on my own experience and expertise in the relevant technologies and systems that were already in use prior to, and within the timeframe of the earliest priority date of the claimed subject matter in the 884 Patent—March 23, 1999.

II. SUMMARY OF OPINIONS

7. Claims 5-7 of the 884 Patent cover systems for covering an architectural opening. However, the components, their functions, and interconnections within the claimed systems are well-known mechanical components and are based on routine mechanical engineering designs that were documented before the earliest priority date of the 884 Patent. Claims 5-7 are mere obvious and routine combinations of components and features that were known in

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