

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

WEBASTO ROOF SYSTEMS, INC.
Petitioner,

v.

UUSI, LLC
Patent Owner.

Case IPR2014-00648
Patent 8,217,612

REPLY DECLARATION OF HAMID A. TOLIYAT, PH.D.

Attorney Docket: 130163.231151

WEBASTO EX. 1021

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I, Hamid A. Toliyat, hereby declare as follows:

1. I have been retained by counsel for Petitioner Webasto Roof Systems, Inc. I am being compensated for my work in this matter at a rate of \$450 per hour, and my compensation is not dependent in any way on the outcome of this proceeding.
2. I previously submitted a declaration regarding the invalidity of the '612 Patent in this *inter partes* review proceeding. See IPR2014-00648, Ex. 1003. I incorporate and stand by my opinions from my prior declaration that claims 1-2 and 5-8 of the '612 Patent are invalid for anticipation and/or obviousness based on the prior art.
3. I submit this declaration to reply to certain statements made by Dr. Ehsani in his Declaration (Ex. 2001) in support of the Patent Owner's Response and in the Patent Owner, UUSI, LLC's ("UUSI's") Response (Paper No. 20).

I. SUMMARY OF OPINIONS FOR THE '612 PATENT

4. The Board instituted an *inter partes* review of the '612 Patent for claims 1-2 and 5-8 based on the following grounds:
 - Claims 6-8 under 35 U.S.C. 102(b) as anticipated by Bernard (Ex. 1005)
 - Claims 1-2 and 5-8 under 35 U.S.C. 102(a) as unpatentable over Lamm et al. (Ex. 1008), in view of Itoh (Ex. 1006) and Bernard; and

- Claims 1-2 and 6-8 under 35 U.S.C. 102(a) as unpatentable over Duhome (Ex. 1009), in view of Kinzl (Ex. 1007).

IPR2014-00648, Paper 14.

5. As I described in my original Declaration (Ex. 1003) and as further described in more detail below, it is my opinion that claims 1-2, and 5-8 of the '612 patent are invalid based on each of the instituted grounds for inter partes review.

II. QUALIFICATIONS

6. As described in my original Declaration (Ex. 1003), I am familiar with the state of the art as it relates to the '612 patent during the relevant time period, April 1992. My qualifications are set forth more fully in my curriculum vitae (Ex. 1004) and my original Declaration (Ex. 1003), so I will only briefly address them here. I am a licensed Professional Engineer, and earned a Ph.D. with a specialization in Industrial Drives, Electrical Machines, Power Electronics, Power Systems and Control from the University of Wisconsin-Madison in 1991, a M.S. in Electrical Engineering from West Virginia University in 1986, and a B.S. in Electrical Engineering from Sharif University of Technology in May 1982. Since 1987, I have held numerous teaching and research positions in the field of electrical engineering at the University of Wisconsin-Madison (Jan. 1987 – May 1991),

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