

IPR2014-01175  
Patent No. 6,968,884

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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NORMAN INTERNATIONAL, INC.  
Petitioner

v.

HUNTER DOUGLAS, INC., ANDREW J. TOTI TESTAMENTARY  
TRUST, RUSSELL L. HINCKLEY, SR., and ROBERT F. MILLER  
Patent Owner

Case No. IPR2014-00283  
U.S. Patent No. 6,283,192

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**EXPERT DECLARATION OF JOHN A. COREY, P.E.**

I, John A. Corey, being over the age of 18 and competent to make the statements herein, hereby declare the following:

**I. SCOPE OF THE REPORT**

1. I have been retained on behalf of Hunter Douglas, Inc. (“Patent Owner”) as an expert consultant to analyze and provide my opinions on the validity of U.S. Patent No. 6,968,884 (the “‘884 Patent”), and such other topics as addressed in this report.

2. As part of this work, I have been requested by counsel for Patent Owner to study the challenged claims of the ‘884 Patent and compare them with the Grounds identified by Petitioner Norman International Inc. (“Petitioner”) and instituted by the Board in its February 10, 2015 Decision regarding Institution of *Inter Partes* Review (Paper 7).

3. I have prepared this report summarizing certain of my opinions regarding this subject matter and its relevance to the validity of the ‘884 Patent.

4. If called upon to do so, I am prepared to testify as an expert witness in this regard.

5. This declaration is based on 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 have not yet been taken.

## **II. EXPERT QUALIFICATIONS AND BACKGROUND**

6. A detailed Curriculum Vitae that includes my professional qualifications, publications, honors and professional activities is attached with this report as Attachment A.

7. I have over 29 years of experience in the window covering industry.

8. I hold a Bachelor of Science in Mechanical Engineering and a Master of Science in Mechanical Engineering from Union College, with a minor in Advanced Mathematics. I also previously held a Graduate Research Fellowship in Advanced Energy Storage/Flywheels supported by Lawrence Livermore National Laboratory.

9. I am currently Vice President for Innovation & Engineering at Chart, Inc. I am responsible for leading development, delivery to the market, and sustaining engineering of diverse biomedical products.

10. Since at least 1985, I have been an active inventor and engineer in the window coverings industry, associated with Comfortex Window Fashions (“Comfortex”) and for many years have served as Director of Research and Development for Comfortex. During my tenure there, I have

provided guidance and support for product development, including the invention of the double-depth cellular window coverings and key manufacturing equipment that formed the basis for the creation of Comfortex as a manufacturing concern. I also have consulted as an expert witness, including providing a patent infringement analysis in the field of window coverings. Since at least 1987, I have led the technical development of primary products, including but not limited to, equipment used for double cell and 3-D fabric venetian window shade products and their manufacture including, but not limited to, the world's fastest and widest pleater, a unique helical textile lap-laminator, integration of a unique 2-sided, registered printing line, and certain curing systems.

11. I am a named inventor on 57 U.S. Patents, many of which relate to window coverings. These patent numbers and titles are listed on my Curriculum Vitae.

12. I am being compensated at a rate of \$225 per hour plus reimbursement for usual business expenses, which is my standard and customary practice. My compensation is not dependent on the outcome of this matter.

13. During the past four (4) years, I have provided expert testimony or reports in the following cases: *Judkins v. HT Window Fashion Corp.*,

Case No. 2:07-cv-00251-GLL, United States District Court, Western District of Pennsylvania; *Norman International, Inc. v. Hunter Douglas, Inc. et al.*, IPR2014-00283, United States Patent & Trademark Office Patent Trial & Appeal Board.

### III. MATERIALS REVIEWED

14. In forming my opinions, I reviewed:

- Petition for *Inter Partes* Review of U.S. Patent No. 6,968,884 B2 (the “Petition”) (Paper 1) and the following exhibits thereto:
  - Ex. 1003 U.S. Patent No. 3,327,765 (“Strahm”)
  - Ex. 1006 U.S. Patent No. 2,390,826 (“Cohn”)
  - Exhibit 1009 Declaration of Lawrence E. Carlson in Support of Petition for Inter Partes Review of U.S. Patent No. 6,968,884B2;
  - Exhibit 1010 Declaration of Patrick E. Foley in Support of Petition for Inter Partes Review of U.S. Patent No. 6,968,884B2
- Patent Owner’s Preliminary Response Under 37 CFR § 42.107 to Petitioner for *Inter Partes* Review of U.S. Patent No. 6,968,884 (Paper 6); and

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