

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NORMAN INTERNATIONAL, INC.

Petitioner

v.

HUNTER DOUGLAS INC.

Patent Owner

CASE: IPR2014-01175

Patent No. 6,968,884

**DECLARATION OF LAWRENCE E. CARLSON
IN SUPPORT OF PETITIONER'S REPLY TO
PATENT OWNER'S RESPONSE OF MAY 4, 2015**

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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 at Boulder. I am also an independent consultant on various matters involving mechanical engineering.

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

3. My previous declaration in this *inter partes* review dated July 16, 2014, at Exhibit 1009 (my "2014 Declaration") provides helpful explanation of my credentials and experience, the relevant technology, and my opinions with respect to the 884 patent.

4. In this declaration, I will address only those issues necessary to reply to and rebut arguments or issues newly raised in Patent Owner's Response filed on May 4, 2015 (Paper 9) ("Response"), and the Expert Declaration of John A. Corey, P.E. (Exhibit 2001) ("Corey Declaration") in support thereof.

5. This declaration is based on the information currently available to me, including the 884 patent, the prior art references and information discussed in this declaration and my previous declaration, other references specifically identified in this declaration and my previous declaration, and the Patent Owner's Response

filed May 4, 2015, including the Declaration of John A. Corey and all other exhibits. I also rely upon my own experience and expertise in the relevant technologies and systems. If additional information becomes available, I reserve the right to continue my investigation and study.

II. SUMMARY OF OPINIONS

6. For the purpose of this Declaration, I have been asked by Petitioner's counsel to provide facts and my opinions in response to specific arguments and evidence raised by Patent Owner in Patent Owner's Response.

7. In my opinion, experience with so-called "hard" window coverings is not necessary to qualify a person of ordinary skill in the art. Such window coverings are combinations of basic, well-known mechanical components, which are found in typical undergraduate mechanical engineering curricula.

8. In my opinion, claim 7 is invalid as obvious over Cohn (U.S. Patent No. 2,390,826) (Ex. 1006) in view of Strahm (U.S. Patent No. 3,327,765) (Ex. 1003).

9. In my opinion, a person of ordinary skill in the art at the time of the invention claimed in claim 7 of the 884 patent would recognize that Strahm teaches a suitable means to stop and maintain the height of the window covering in Cohn, and that a person of ordinary skill in the art would have the mechanical knowledge to implement the brake of Strahm in the system of Cohn.

10. Further, I find nothing so complex in either Cohn or Strahm as to render the technologies disclosed therein incompatible, nor do I find that either of those references would have taught away from the combination for the purpose of claim 7.

11. I agree with the PTAB's conclusion that the disclosures of Cohn and Strahm "provide sufficient support for Petitioner's contention that one of ordinary skill in the art would have considered Strahm's friction brake a suitable means for stopping and maintaining Cohn's venetian blind" and that one of ordinary skill in the art would have "found implementation of Strahm's friction brake in Cohn's device to be nothing more than a predictable variation of Cohn's pawl stops 43."

III. QUALIFICATIONS AND EXPERIENCE

A. Education and Work Experience

12. A more detailed explanation of my educational and work credentials is provided in Paragraphs 16 through 23 of my 2014 Declaration in Exhibit 1009 and in my CV, which was included in Attachment A to Exhibit 1009. But to highlight a few key qualifications, I received a Bachelor of Science degree in Mechanical Engineering from the University of Wisconsin in 1967. I also received a Master's degree (M.S.) and a Doctorate degree (D.Eng.) in Mechanical Engineering from the University of California at Berkeley in 1968 and 1971, respectively.

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