UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NORMAN INTERNATIONAL, INC.
Petitioner

v.

HUNTER DOUGLAS, INC.,
Patent Owner

Case No. IPR2014-01175
U.S. Patent No. 6,698,884

DECLARATION OF KRISTOPHER L. REED

September 14, 2015

I, Kristopher L. Reed, hereby declare the following:

1. I am an attorney with the firm of Kilpatrick Townsend & Stockton LLP.

2. I am over 18 years of age.

3. Unless otherwise stated, I make this Declaration upon personal knowledge and experience.

4. If called upon, I can competently testify to the facts stated in the Declaration.

5. On February 24, 2015, Patent Owner served its objections to exhibits filed with the Petition pursuant to 37 C.F.R. § 42.64(b)(1). A true and correct copy of those objections is attached hereto as Appendix A.

The contents of this declaration are true under penalty of perjury of the laws of the United States.

Executed September 14, 2015, in Denver, Colorado.

Signature: *s/ Kristopher L. Reed*
Kristopher L. Reed

APPENDIX A

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

NORMAN INTERNATIONAL, INC.
Petitioner

v.

HUNTER DOUGLAS, INC.
Patent Owner

Case No. IPR2014-01175
U.S. Patent No. 6,698,884

Before LINDA M. GAUDETTE, JAMES P. CALVE, and HYUN J. JUNG, *Administrative Patent Judges.*

PATENT OWNER'S OBJECTIONS TO PETITIONER'S EXHIBITS PURSUANT TO 37 C.F.R. § 42.64(b)(1)

February 24, 2015

Patent Owner Hunter Douglas, Inc. ("Patent Owner") hereby objects pursuant to 37 C.F.R. § 42.64, to the admissibility of the following exhibits submitted by Petitioner Norman International, Inc. ("Petitioner") for the following reasons.

1. Petitioner's Exhibits 1002 ("Tachikawa"), 1004 ("Skidmore"), 1005 ("Schuetz"), 1007 ("Todd"), and 1008 ("Toti") are inadmissible as each is irrelevant. In its Institution of *Inter Partes* Review Decision, the Board determined that trial should not be instituted on the grounds advocated by Petitioner that refer to these exhibits. (Paper 9 at 10-17, 21-23.) These exhibits are accordingly irrelevant and immaterial.
2. Petitioner's Exhibit 1009 ("Carlson Declaration") is inadmissible as it fails to show that Lawrence E. Carlson is an expert in the relevant field of art pursuant to Federal Rule of Evidence 702. Mr. Carlson claims that he is qualified to opine as an expert because of his "40 years educating engineering students on mechanical and component design" and "40 years of experience in mechanical design and research in numerous fields, including rehabilitation engineering, upper-limb prosthetics, consumer products, sculptures, and products to help developing countries." Ex. 1009 at ¶¶ 17-23. Those self-serving conclusions are undermined by a review of Mr. Carlson's curriculum vitae and his own

DOCKET ALARM

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts

Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research

With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips

Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS
Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS
Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS
Sync your system to PACER to automate legal marketing.