

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 B2

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

**PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE
SUBMITTED AFTER INSTITUTION OF A TRIAL
UNDER 37 C.F.R. § 42.64(b)(1)**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Norman International, Inc. ("Petitioner") hereby timely objects to the evidence submitted by Patent Owner with Patent Owner's Response under 37 C.F.R. § 42.120 (Paper 9) filed May 4, 2015, in response to the Board's Institution Decision (Paper 7) of February 10, 2015, which instituted trial for *inter partes* review of United States Patent No. 6,968,884 ("the '884 patent"). These objections are timely made within five business days of service of evidence.

1. Exhibit 2001 filed by Patent Owner is inadmissible under Federal Rule of Evidence ("FRE") 702 because it fails to demonstrate that Mr. Corey has special knowledge, skill, experience, training, or education in the relevant field of art of the '884 patent. Instead, Exhibit 2001 merely presents vague, conclusory, and self-serving assertions that fall short of the requirements of FRE 702. (*See, e.g.* Ex. 2001 at ¶¶ 10, 26, 28.) A close read of Mr. Corey's own description of his knowledge and experience in his declaration and curriculum vitae reveals that he has no specialized knowledge, skill, experience, training, or education in the use of spring motors and brakes in mechanical and component design. (*See* Ex. 2001 at ¶ 10; *id.*, Attach. A at 2 (describing experience with *fabric* products instead of mechanical products).) Accordingly, Mr. Corey's alleged window covering experience has no bearing on the claimed invention of the '884 patent. Exhibit 2001 is

therefore inadmissible because Patent Owner fails to establish or explain why Mr. Corey is qualified to testify regarding the field of invention or the validity of the '884 patent.

2. Exhibit 2001 is further inadmissible under FRE 403 and 702 as unreliable and biased in view of Mr. Corey's longstanding employment with Comfortex Window Fashions, which is a subsidiary of Patent Owner Hunter Douglas, Inc. (Ex. 2001 at ¶ 10; *id.*, Attach. A at 2.)

These objections have been timely made and served within five business days of service of evidence to which the objections are directed.

Dated: May 11, 2015

Respectfully submitted,

/Bing Ai /

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing
PETITIONER'S OBJECTIONS TO PATENT OWNER'S EVIDENCE has been
served in its entirety this 11th day of May, 2015 by electronic mail as agreed upon
by the parties on the Patent Owner via its attorneys of record:

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