## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE PATENT TRIAL AND APPEAL BOARD

Valeo North America, Inc., Valeo S.A., Valeo GmbH, Valeo Schalter und Sensoren GmbH, and Connaught Electronics Ltd. Petitioners

v.

Magna Electronics, Inc.
Patent Owner

U.S. Patent No. 8,643,724 Case IPR2015-\_\_\_\_

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Patent Trial and Appeal Board
United States Patent and Trademark Office
Madison Building (East)
600 Dulany Street
Alexandria, VA 22313

DECLARATION OF DR. RALPH V. WILHELM REGARDING U.S. PATENT NO. 8,643,724



I, Dr. Ralph V. Wilhelm, do hereby declare and state, that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.

week.

Dated: November 7, 2014

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| J  | 8.    | U.S. Patent No. 4,390,895 ("Sato," Ex. 1021)  |
|----|-------|---|
|    | 9.    | SAE Paper No. 890288 ("Goesch," Ex. 1022)   |
| F. | Motiv | vations to Combine  |
|    | 1.    | Claims 1-18, 20, 22, 23, 25, 29-32, 41, 42, 43, and 48 are obvious over Nissan, Hino, and Lemelson                  |
|    | 2.    | Claim 1 is obvious in view of Nissan, Hino, and Lemelson 34   |
|    | 3.    | Claim 3 is obvious in view of Nissan, Hino, and Lemelson 36   |
|    | 4.    | Claims 5 and 6 are obvious in view of Lemelson  |
|    | 5.    | Claim 24 is obvious over Nissan, Hino, Lemelson, and Niles 38   |
|    | 6.    | Claim 26 is obvious over Nissan, Hino, Lemelson, Aishin, and Schmidt  |
|    | 7.    | Claims 27 and 28 are obvious in view of Nissan, Hino,<br>Lemelson, and Fuji   |
|    | 8.    | Claims 33 and 35-38 are obvious over Nissan, Hino, Lemelson, and Otsuka   |
|    | 9.    | Claim 34 is obvious over Nissan, Hino, Lemelson, Otsuka, and Conner   |
|    | 10.   | Claim 39 is obvious over Nissan, Hino, Lemelson, Otsuka, and Sato   |
|    | 11.   | Claim 40 is obvious in view of Nissan, Hino, Lemelson, Otsuka, and Paff   |
|    | 12.   | Claim 44 is rendered obvious by Nissan, Hino, Lemelson, and King  |
|    | 13.   | Claim 45 is obvious over Nissan, Hino, Lemelson, and Goesch   |
|    | 14.   | Claims 49-56, 58, 61, 62, 64-71, 73, 75-82, 84, and 86 are obvious over Nissan, Hino, Lemelson, Wang, and Aishin 58 |



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|--------------------|---|----|
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| 15.                | Claims 57, 72, and 83 are obvious over Nissan, Hino,<br>Lemelson, Wang, Aishin, and Fuji. | 62 |
| 16.                | Claim 59 is obvious over Nissan, Hino, Lemelson, Wang, Aishin, and Otsuka                 | 63 |
| 17.                | Claim 60, 74 and 85 are obvious over Nissan, Hino, Lemels Wang, Aishin, and Paff          | ,  |
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