

REQUEST FOR *INTER PARTES* REVIEW

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of

Docket No: PR00024

Jeffery R. Parker, et al.

Issued: May 3, 2005

U.S. Patent No. 6,886,956

Application No. 10/298,367

Filing Date: November 18, 2002

For: **LIGHT EMITTING PANEL ASSEMBLIES FOR USE IN
AUTOMOTIVE APPLICATIONS AND THE LIKE**

**DECLARATION OF EDWARD F. CAROME, PHD. IN SUPPORT OF
KOITO MANUFACTURING CO., LTD. AND STANLEY ELECTRIC CO.,
LTD.**

REQUEST FOR *INTER PARTES* REVIEW
OF U.S. PATENT NO. 6,886,956 UNDER 35 U.S.C. §§311-319, 37 C.F.R. § 42

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Declaration of Edward F. Carome.
U.S. Patent No. 6,886,956

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Declaration of Edward F. Carome.
U.S. Patent No. 6,886,956

EXHIBITS AND ATTACHMENTS

I may refer to the following Exhibits that I understand were submitted by Petitioners in connection with this IPR.

Exhibit	Description
1001	U.S. Patent No. 6,886,956
1002	File History of U.S. Patent No. 6,886,956
1003	JP H5-25602U (“JP ‘602”)
1004	Certified Translation of JP ‘602
1005	JP H1-92004U (“JP ‘004”)
1006	Certified Translation of JP ‘004
1007	U.S. Patent No. 5,005,108 to Pristash et al. (“US ‘108” or “Pristash”)

ATTACHMENT A: CV of Edward F. Carome, Ph.D.

**Request for Inter Partes Reexamination
of U.S. Patent No. 6,886,956**

I. INTRODUCTION AND BACKGROUND

1. I have been retained by counsel for Petitioners Koito Manufacturing Co., Ltd. and Stanley Electric Co., Ltd. ("Petitioners"), and asked to review and opine on the patentability/patentability of claims 1, 4, 5, 6, 9, 16, 21 and 31 of U.S. Patent No. 6,886,956 (Ex. 1001, "the '956 Patent"). I am being reimbursed for my time at my normal consulting rate of \$350 per hour. My pay is in no way contingent on the outcome of this proceeding.
2. I am Emeritus Professor of Physics at John Carroll University and was a member of the University's Lighting Innovations Institute throughout its existence from 1996 through August 2014. I am also working as a Senior Scientist at Light Innovations, LLC. I have been involved in advanced optical research since the mid -1960's and I have held various positions for my research and development work on advanced optical systems, especially lighting systems using light emitting diodes (LEDs).
3. A more complete summary of my experience and expertise is set forth in my CV, which is attached as Attachment A to this Declaration.

Declaration of Edward F. Carome, PhD
Re U.S. Patent No. 6,886,956

II. SUMMARY OF MY OPINIONS

4. It is my opinion that claims 1, 4, 5, 6, 9, 16, 21 and 31 of the '956 Patent are unpatentable. My opinions are based on my expertise in the technology of the '956 Patent, as well as my review of the '956 Patent, its file history, and the prior art asserted by the Petitioners. If the patent owner is allowed to submit additional evidence pertaining to the patentability of the '956 Patent, I intend to review that as well and update my analysis and conclusions as appropriate and allowed under the rules of this proceeding.

A. Instructions

5. I am not an attorney. My analysis and opinions are based on my expertise in this technical field, as well as the instructions I have been given by counsel for the legal standards relating to patent patentability.
6. The materials I have reviewed in connection with my analysis include the '956 Patent, its file history, and the cited references and exhibits.
7. I understand that patents are presumed to be valid. I understand that unpatentability in this proceeding must be proven by a preponderance of evidence, and that is the standard I have used throughout my report. Further, I

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