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.

Case IPR2015-01410[1]
Patent 8,643,724 B2

SUPPLEMENTAL DECLARATION OF DR. GEORGE WOLBERG

[1] Case IPR2015-01414 has been consolidated with this proceeding.

I, Dr. George Wolberg, 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.

Dated: May 23, 2016

George Wolberg

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I. INTRODUCTION

1. I submit this Supplemental Declaration to offer my opinions regarding the patentability and validity of claims 1, 3–12, 14, 15, 17, 19–52, 54–67, 69–79, and 81–86 of U.S. Patent No. 8,643,724 ("the '724 Patent"). More specifically, I provide my opinions regarding Patent Owner's Response (Paper 14), Dr. Etienne-Cummings's Declaration (Exhibit 2004) and other exhibits submitted by Patent Owner.

2. I set forth my professional qualifications and experience and attached my curriculum vitae with my declaration submitted on June 15, 2015. (Ex. 1020-21).

3. In forming the opinions I express in this Supplemental Declaration, I considered the materials cited in Patent Owner's Response, Dr. Etienne-Cummings's Declaration, and any materials I cite in this Supplemental Declaration. I have further considered all materials that were cited in my original declaration submitted on June 15, 2015. I also rely on my years of education, research and experience, as well as my investigation and study of relevant materials.

II. LEGAL STANDARDS

4. In expressing my opinions and considering the subject matter of the claims of the '724 Patent, I am relying upon certain basic legal principles that counsel has explained to me.

A. Obviousness

5. It is my understanding that a patent claim is unpatentable if the claimed invention as a whole would have been obvious to a person having ordinary skill in the art ("PHOSITA") at the time of the invention, in view of the prior art in the field and analogous fields. This means that even if all of the elements of the claim are not described or disclosed in a single prior art reference, the claim can still be unpatentable. I understand that in order to prove that a claimed invention is unpatentable for obviousness, it is necessary to (1) identify the differences between the claim and particular disclosures in the prior art references, singly or in combination; (2) specifically explain how the prior art references could have been combined in order to arrive at the subject matter of the claimed invention; and (3) specifically explain why a PHOSITA would have been motivated to so combine the prior art references. I understand the claims are unpatentable if it is more likely than not that the claims are obvious.

B. Reasons to Combine

6. To determine whether a claim is obvious, I understand that I may combine multiple references if a PHOSITA would have had apparent reasons to combine the references at the time of the alleged invention. I have been informed that reasons to combine references can include: (a) combining prior art elements according to known methods to yield predictable results; (b) simple substitution of

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