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 IPR2015	1

Mail Stop PATENT BOARD
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

VALEO EXHIBIT 1022 Valeo v. Magna



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.

Elled.

Dated: June <u>12</u>, 2015

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		3.	U.S. Patent No. 4,963,788 ("King," Ex. 1013)	21
		4.	U.S. Patent No. 4,966,441 ("Conner," Ex. 1014)	22
		5.	U.S. Patent No. 5,793,420 ("Schmidt," Ex. 1015)	24
		6.	U.S. Patent 4,833,534 ("Paff," Ex. 1017)	25
		7.	SAE Paper No. 871288 ("Otsuka," Ex. 1016)	26



Declaration of Dr. Ralph Wilhelm Regarding U.S. Patent No. 8,643,724

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	8.	U.S. Patent No. 4,390,895 ("Sato," Ex. 1018)
	9.	SAE Paper No. 890288 ("Goesch," Ex. 1019)
F.	Motiv	vations to Combine
	1.	Claims 1, 2, 3, 4-6, 10-18, 23, 25, 29-32, 41-43, 46-48are obvious over Yamamoto, Mitsubishi, and Lemelson 31
	2.	Claim 1 is obvious in view of Yamamoto, Mitsubishi, and Lemelson
	3.	Claims 5 and 6 are obvious in view of Yamamoto, Mitsubishi, and Lemelson
	4.	Claim 24 is obvious over Yamamoto, Mitsubishi, Lemelson, and Niles
	5.	Claim 26 is obvious over Yamamoto, Mitsubishi, Lemelson, Aishin, and Schmidt
	6.	Claims 27 and 28 are obvious in view of Yamamoto, Mitsubishi, Lemelson, and Fuji
	7.	Claims 33 and 35-38 are obvious over Yamamoto, Mitsubishi, Lemelson, and Otsuka
	8.	Claim 34 is obvious over Yamamoto, Mitsubishi, Lemelson, Otsuka, and Conner
	9.	Claim 39 is obvious over Yamamoto, Mitsubishi, Lemelson, Otsuka, and Sato
	10.	Claim 40 is obvious in view of Yamamoto, Mitsubishi, Lemelson, Otsuka, and Paff
	11.	Claim 44 is rendered obvious by Yamamoto, Mitsubishi, Lemelson, and King
	12.	Claim 45 is obvious over Yamamoto, Mitsubishi, Lemelson,



Declaration of Dr.	Ralph Wilhelm
Regarding U.S. Pa	ntent No. 8,643,724
13.	Claims 49-56, 58, 61, 62, 64-71, 73, 75-82, 84, and 86 are obvious over Yamamoto, Mitsubishi, Lemelson, Wang, and Aishin
14.	Claims 57, 72, and 83 are obvious over Yamamoto, Mitsubishi, Lemelson, Wang, Aishin, and Fuji
15.	Claim 59 is obvious over Yamamoto, Mitsubishi, Lemelson, Wang, Aishin, and Otsuka
16.	Claim 60, 74 and 85 are obvious over Yamamoto, Mitsubishi,

	17.	Claim 63 is obvious over Yamamoto, Mitsubishi, Lemelson,	,
		Wang, Aishin, and King.	. 72
11/	CONCLUS	ON	73

Lemelson, Wang, Aishin, and Paff......70



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