#### 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-\_\_\_\_

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#### 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.

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

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

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F.	Motivations 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 40		
	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, and Goesch		

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	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, Lemelson, Wang, Aishin, and Paff70	
	17.	Claim 63 is obvious over Yamamoto, Mitsubishi, Lemelson, Wang, Aishin, and King	
IV.	CONCLUSION		

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