UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIALS AND APPEAL BOARD

SL CORPORATION
Petitioner,

v.

ADAPTIVE HEADLAMP TECHNOLOGIES, INC.
Patent Owner

INTER PARTES REVIEW OF U.S. PATENT NO. 7,241,034
Case IPR No.: Unassigned

PETITION FOR *INTER PARTES* REVIEW OF U.S. PATENT NO. 7,241,034 UNDER 35 U.S.C. §§ 311-319 AND 37 C.F.R. §§ 42.1-80, 42.100 *et seq*.

DECLARATION OF HARVEY WEINBERG

Table of Contents

I, Harvey Weinberg, being of legal age, hereby declare, affirm, and state the following:

I. INTRODUCTION

1. I have been retained on behalf of Petitioner, SL Corporation ("SL"), to offer statements and opinions generally regarding the validity, novelty, prior art, obviousness considerations, and understanding of a person of ordinary skill in the art ("POSITA") in the industry as it relates to U.S. Patent No. 7,241,034 ("'034 patent"). Attached hereto as Appendix A is a true and correct copy of my Curriculum Vitae describing my background and experience. I have personal knowledge of the facts and opinions set forth in this declaration, and, if called upon to do so, I would testify competently thereto. All of the opinions and conclusions found in this declaration are my own.

2. I am being compensated at a rate of $200 per hour for my services. This compensation is in no way based on the content of my opinions or the outcome of this matter.

II. BACKGROUND AND QUALIFICATIONS

3. Please refer to my resume attached as Appendix A.

4. To summarize with respect to the technology of the '034 patent, I have over 18 years of experience in the automotive industry in various areas supporting automotive OEMs directly and through Tier-One manufacturers in the following

applications: MEMS inertial sensors used for crash detection (sensors used in center crash modules as well as those used as "satellite" sensors at doors, near front bumpers, etc.); MEMS inertial sensors (gyroscopes and low-g accelerometers) used in electronic stability control; MEMS inertial sensors (gyroscopes and accelerometers) used in roll over detection; MEMS inertial sensors (gyroscopes and accelerometers) used in body/chassis management electronics including theft alarms, sliding door protection, noise cancellation, suspension control, etc.; current sensing for transmission control; Li-Ion and Lead-Acid battery management for conventional internal combustion engines as well as hybrid electric vehicles; and LIDAR (optical RADAR) systems for short and mid-range presence detection.

III. MATERIALS CONSIDERED

5. In developing my opinions below relating to the '034 patent, I have considered the materials cited herein, as well as the following materials:

6. US Patent 7,241,034 ("the '034 Patent") (Petition Ex. 1001);

7. Japanese Patent Application No. 09-151649 ("Kato") (Petition Ex. 1023);

8. Japanese Patent Application No. 10-364667 ("Fukuwa") (Petition Ex. 1024);

9. UK Patent Application GB2,309,774 ("Takahashi) (Petition Ex. 1018);

10. US Patent 6,293,686 ("Hayami") (Petition Ex. 1025);

11. ROBERT BOSCH GMBH, AUTOMOTIVE HANDBOOK (Horst Bauer *et al.* eds., 5th ed. 2000) (Appendix B);

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