

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.: IPR2016-00193

REPLY DECLARATION OF HARVEY WEINBERG

SL Corp Exhibit 1035

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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 Corp.”), to offer analysis 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”). In connection with this analysis, I prepared a declaration that was submitted as Exhibit 1002 to the Petition for *Inter Partes* Review of the ‘034 patent, Paper 2. Attached to that declaration is a true and correct copy of my Curriculum Vitae describing my background and experience. Ex.1002, Appendix A. My background, qualifications, and experience is described in detail in that declaration, which I incorporate by reference here. Ex.1002 at ¶¶3-4.
2. I have reviewed Patent Owner’s Response to SL Corp.’s Petition for *Inter Partes* Review in this matter, Paper 16, dated July 22, 2016, and the accompanying Declaration of Joseph Katona, Katona (“Katona”). I have prepared this declaration of my analysis and opinions in response to certain arguments and opinions presented by Patent Owner and Mr. Katona.
3. 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. 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. MATERIALS CONSIDERED

4. In developing my opinions below relating to the '034 patent, I have considered the materials cited herein, the materials listed in my initial declaration at Ex.1002 ¶¶6-12, and the materials listed below:

- (1) Declaration of Joseph Katona (Patent Owner Ex.2002) (“Katona”);
- (2) Suzuki SV650S Brochure (Pet. Ex.1029);
- (3) Dana Corporation Supplies Cooling Module For Harley-Davidsons First High-Volume Liquid-Cooled Motorcycle, DANA, Apr. 6, 2016, <http://dana.mediaroom.com/index.php?s=26450&item=68975> (Pet. Ex.1030);
- (4) Image of Suzuki Motorcycle, http://media.autobase.co.nz/VehicleImages/Full/2/6/8/2687956_1.jpg (last visited Nov. 11, 2016) (Pet. Ex.1031);
- (5) Honda GOLD WING GL1800 Owner’s Manual (Pet. Ex.1032);
- (6) Suzuki TL1000S Brochure (Pet. Ex.1033);
- (7) Katona Deposition, November 15, 2016 (Pet. Ex.1034) (“Katona Dep.”);

- (8) September 25, 2003 Information Disclosure Statement (Pet. Ex.1036);
- (9) US Patent 3,939,339 (Pet. Ex.1037);
- (10) US Patent 4,024,388 (Pet. Ex.1038);
- (11) US Patent 4,833,573 (Pet. Ex.1039);
- (12) US Patent 4,868,720 (Pet. Ex.1040);
- (13) US Patent 4,870,545 (Pet. Ex.1041);
- (14) US Patent 5,158,352 (Pet. Ex.1042);
- (15) US Patent 5,426,571 (Pet. Ex.1043);
- (16) The Definition of Vehicle, DICTIONARY.COM, <http://www.dictionary.com/browse/vehicle> (last visited Nov. 4, 2016) (Pet. Ex.1044);
- (17) ROBERT BOSCH GMBH, AUTOMOTIVE HANDBOOK 716-17 (Horst Bauer *et al.* eds., 5th ed. 2000) (Pet. Ex.1045); and
- (18) Koito Manufacturing Co., Ltd., 2002 Annual Report (Mar. 31, 2002) (Pet. Ex.1046).

III. PERSON OF ORDINARY SKILL IN THE ART

5. Mr. Katona explains that a person of ordinary skill in the art (“POSITA”) “would have at least a bachelor’s degree in electrical engineering, computer science, physics, or other related field of study and at least two years of relevant work experience in the automotive industry.” Katona ¶28. That part of Mr.

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