

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

JOHNSON SAFETY, INC.,
Petitioner, v.
VOXX INTERNATIONAL CORPORATION
Patent Owner.

Patent No. 7,245,274
Filing Date: May 15, 2003
Issue Date: July 17, 2007
Title: HEADREST MOUNTABLE VIDEO SYSTEM

Inter Partes Review No. IPR2016-01070

DECLARATION OF JAMES R. TRANCHINA

1. My name is James R. Tranchina. I am over the age of 18 and competent to testify as to the matters set forth herein. I am the Vice President of Engineering and Chief Technology Licensing Officer of Voxx International Corporation (“Voxx”). The factual statements that follow are based on my personal knowledge or from business records kept by Voxx in the ordinary course of its business at the relevant time.

2. I am familiar with various video entertainment products that Audiovoxx Electronics Corporation n/k/a Voxx Electronics Corporation and Invision Automotive Systems, Inc. (collectively “VEC”) have sold over the years. Audiovoxx Electronics Corporation n/k/a Voxx Electronics Corporation and Invision Automotive Systems, Inc. are wholly owned subsidiaries of Voxx.

3. I am familiar with U.S. Patent No. 7,245,274 (“ ‘274 Patent”), which was filed on May 15, 2003, and discloses a “headrest mountable video system.”

4. Claims 1, 5 and 11 of the ‘274 Patent recite the following:

1. A video system comprising:

a base unit coupled to an internal headrest support structure; and

a door pivotally connected to the base unit by a hinge, the door comprising a display and a media player comprising at least one of a DVD player, an MPEG player or a video game player.

5. The video system of claim 1, wherein the video system is a slot-type device.

11. A video system comprising:

a base portion positioned in a headrest of a vehicle seat,

wherein the base portion accommodates a media player comprising at least one of a DVD player, an MPEG player or a video game player and a display pivotally connected to the base portion.

5. I understand that for a product to embody claims 1, 5 or 11 of the ‘274 Patent, the product must include every feature recited in either claims 1, 5 or 11.

6. The relevant market for products which embody the invention of claims 1, 5 or 11 of the '274 Patent, as well as products which compete with the invention of the '274 Patent, are headrest mounted monitors. Products sold by VEC which embody the features recited in either claims 1, 5 or 11 of the '274 Patent are hereinafter referred to as "the PRODUCTS".

7. The PRODUCTS comprise approximately seventy-five percent (75%) of VEC's total headrest mounted monitor sales since the issue date of the '274 Patent.

8. In the years following issuance of the '274 Patent, VEC saw increased demand for the PRODUCTS covered by the '274 Patent.

9. VEC has had great commercial success of the PRODUCTS and has sold over one hundred million dollars of PRODUCTS since the issue date of the '274 Patent.

10. I declare under the penalty of perjury that to the best of my knowledge that the foregoing is true and correct.

Date: February 24, 2017



James R. Tranchina
VP of Engineering
Chief Technology Licensing Officer