UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GENERAL PLASTIC INDUSTRIAL CO., LTD.
Petitioner

v.

CANON KABUSHIKI KAISHA
Patent Owner

U.S. Patent No. 8,909,094
Issue Date: December 9, 2014
Title: SEALING MEMBER, TONER CONTAINER AND IMAGING FORMING APPARATUS

DECLARATION OF BRIAN SPRINGETT, PH. D.

Case No. IPR2016-01359

GPI EXHIBIT 1008
GENERAL PLASTIC v. CANON
IPR2016-01359

I, Brian Springett, Ph.D., hereby declare and state as follows:

I. BACKGROUND AND QUALIFICATIONS

1. My name is Dr. Brian Springett and I have been retained by Petitioner General Plastic Industrial Co., Ltd. to provide assistance in the above-captioned matter, which I understand to be related to alleged invalidity of certain claims in U.S. Patent No. 8,909,094 ("the '094 patent"), entitled "Sealing Member, Toner Accommodating Container and Image Forming Apparatus".

2. I have summarized in this section my educational background, career history, and other relevant qualifications. A true and accurate copy of my curriculum vitae is attached hereto as Exhibit A.

3. I received a B.A. with Honors in Physics and Mathematics from the University of Cambridge in Cambridge, England in 1960. I also received an M.S. in Physics from the University of Chicago in Chicago, Illinois in 1963, followed by an M.A. in Physics from the University of Cambridge in Cambridge, England in 1964. I earned a Ph.D. from the University of Chicago, Illinois in 1966 in Solid State and Low Temperature Physics. After receiving my Ph.D., I continued my education with short courses on Laser Beams from the University of Chicago, short courses in Optics & Lasers from the University of Rochester and a short course in Technology Management from the Sloan School, Massachusetts Institute of Technology.

4. After leaving Cambridge University and prior to attending the University of Chicago, I spent one year with Hoffman Semiconductor in Southern California working on solar cells and integrated circuits. After earning my Ph.D., I spent one year as a post-doctoral research associate at the University of Chicago before moving to the University of Michigan as an assistant professor in the Physics Department. Additional teaching positions have included visiting professor positions at the University of Oakland, in Rochester, Michigan, and the University of Quebec, in Trois-Rivières, Quebec.

5. In 1974, following my academic positions, I worked for Xerox Corporation for 27 years. During my first 13 years at Xerox Corporation, I conducted research and development on new electrophotographic subsystems, the first Xerox laser printers, system integration of electrophotographic consumables, including work with multiple types of toners, photoreceptors, and charging systems. My work involved coordination of research and development and integration of planning with engineering groups around the world. During the next 14 years at Xerox, I worked in technology management and strategic planning, including research and development on system integration of electrophotographic consumables for new digital products, both black and white and color. This work included membership on standing research and development committees to

monitor progress of technology investments and formulating strategy assessments and refinements, as well as consultation on international standards committees.

6. My 27 years of experience at Xerox Corporation, included working with photoreceptors, toners, developers, toner cartridges, liquid toners, media, and electrophotographic systems (including digital black and white and color printing). Since leaving Xerox Corporation, my educational background has enabled me to work as a business and technology advisor and consultant for the past 12 years. My work as an advisor and consultant has generally but not exclusively been related to electrophotography, including print cartridge remanufacturing, toner development and problem solving, other research and development projects, and business development projects with more than 20 companies in the USA and abroad. I have also made presentations on various aspects of electrophotography and the associated materials and components, such as photoreceptors, toners, carriers, and developers, at ten conferences since June 2001, and I served as the co-chairman of the Toner & Photoreceptors series of conferences run by Tiara Group from 2001 to 2010.

7. I am named as inventor on 13 United States and European patents relating to electrophotographic sub-systems, and methods and applications for photoconductors and toners. I have over 90 publications in various journals relating to low temperature quantum physics, amorphous semiconductors, charge

transport in dense cold gases, charge transport in non-crystalline materials, electrophotographic photoconductors, toners and sub-systems, electrophotography and digital color printing. I have authored a chapter, "Brief Introduction to Electrophotography," in the new edition of a Handbook of Imaging Materials, 2nd edition, revised and expanded, edited by Marcel Dekker, A. Diamond, & D. Weiss, 2002. I have co-authored a Technical Review Article on the Physics of Electrophotography, "Physics of Electrophotography," D.M. Pai & B.E. Springett, Reviews of Modern Physics, vol. 65, no. 1, 1993, pp. 163-211. I have on three occasions presented a four-hour short course entitled "The Business of Toner: A Value-Chain Oriented Introduction" to classes of technical professionals from around the world at the series of International Non-Impact Printing Conferences run by the Society for Imaging Science & Technology. Other of my publications are detailed in the attached curriculum vitae.

8. During the previous four years, I have testified in the patent infringement suit, *Canon, Inc. v. Color Imaging, Inc. and General Plastic Industrial Co., Ltd.,* 1:11-CV-03855-RLV, N.D. Georgia, as an expert by deposition, on behalf of the Defendants.

II. ASSIGNMENT AND MATERIALS REVIEWED

9. I have been retained by General Plastic Industrial Co., Ltd. in connection with its Second Petition for *inter partes* review of U.S. Patent

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