

EXHIBIT 2004

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KAWASAKI RAIL CAR, INC.

Petitioner

v.

SCOTT BLAIR

Patent Owner

IPR2017-00117

Patent No. 6,700,602

SUPPLEMENTAL EXPERT DECLARATION OF JACK R. LONG

I, Jack R. Long, hereby declare the following:

I. BACKGROUND AND QUALIFICATIONS

1. I am over 21 years of age and otherwise competent to make this Declaration. I make this Declaration based on facts and matters within my own knowledge and on information provided to me by others.

2. I have been retained as an expert in this matter by Counsel for Patent Owner Scott Blair to provide my independent opinions on certain issues requested by Counsel for Patent Owner relating to the accompanying petition for *Inter Partes* Review of U.S. Patent No. 6,700,602 ("the '602 Patent"). My compensation in this matter is not based on the substance of the opinions rendered here.

3. I have previously summarized in my original declaration submitted herein (Ex. 2002) my educational background, career history, and other relevant qualifications. I have also attached a current version of my curriculum vitae as Appendix A hereto.

4. I have been working actively in the design engineering industry for more than 35 years.

5. As part of my work in connection with this proceeding, I have reviewed the following materials:

- Patent 6,700,602 (the '602 Patent) including the claims thereof;
- Petition for *Inter Partes* Review of U.S. Patent No. 6,700,602, No. IPR2017-00117 including Exhibits;
- Translation of Japan Train Operation Association Magazine, Vol. 37, Issue No. 3 (March 1, 1995) (Ex. 1003, "JTOA Magazine");

- The translation of Japanese Publication No. 04-085379 (Ex. 1005, "Namikawa");
- The translation of Japanese Publication No. 07-181900 (Ex. 1007, "Miyajima");
- The translation of Japanese Publication No. 04-322579 (Ex. 1011, "Sasao");
- The translation of Japanese Publication No. 04-160991 (Ex. 1009, "Maekawa");
- U.S. Patent No. 5,293,244 to Kawaguchi (Ex. 1022, "Kawaguchi");
- The translation of Japanese Publication No. 02-23985 (Ex. 1021, "Amano");
- The file history of the '602 patent provided in Exhibit 1012;
- The reexamination file history of the '602 patent provided in Exhibit 1013; and
- Decision Instituting *Inter Partes* Review (Paper 11) ("Decision").

II. OVERVIEW OF THE '602 PATENT AND THE PRIOR ART

A. The '602 Patent

6. The '602 patent is directed to a video display monitor system that is mounted at fixed intervals at the junction of the sidewall and the ceiling of a subway car. More particularly, the video monitor system includes an enclosure for the video monitor that is designed to be mounted at the junction in such a manner that the screen of the enclosed video monitor is located substantially flush with the adjacent interior wall structure and oriented obliquely towards the subway car's seats. More particularly, at the junction of the sidewall and ceiling of the subway car is a curved exterior wall segment to which the enclosure is mounted with suitable brackets attached to the back of the enclosure. Between this curved wall and a corresponding interior wall is a cavity within which the enclosure is located. (Ex. 1001 at 3:46-4:14, 4:64-5:20; Figs. 1A, 1B, 4A).

7. The system also comprises a "video signal source unit" connected to the monitors. The "video signal source unit" consists of pre-recorded material for broadcasting on the screens such as news, advertisements etc. It can be in the form of video disk players, CD-ROM players, and video tape players (Ex. 1001 at 2:15-42).

8. The combination of references fails to teach or suggest monitors that are not only mounted at the junction of the sidewall and ceiling of the subway car but are also substantially flushed with the adjacent wall surface structure of the car and directed obliquely downwards. Before the invention of the '602 patent, it was not known to substantially flush the video screen of a video monitor to the adjacent wall surfaces of the mass transit cars whereby the video monitor was mounted at the junction of the ceiling and sidewall of the subway car and directed obliquely downward towards the car seats so that a person sitting in the seat located on the opposite side of the railroad car has a direct line of sight with the monitor screen. All the prior art taught other systems entirely.

B. Namikawa

9. I have reviewed the Namikawa reference in detail. As the Board had already recognized in its Decision (Paper 11 at 15), Namikawa does not disclose installing a substantially flushed screen at the junction of the sidewall and the ceiling of a subway car, but rather specifically teaches externally mounted liquid crystal televisions. Fig. 2 of Namikawa clearly shows the monitors are externally mounted and do not have screens substantially flushed against the wall surface.

10. Nothing within the teachings of Namikawa teaches or suggests the availability of space beyond the wall, let alone the availability of space beyond the wall at the junction of the sidewall and the ceiling to allow for the screen of the monitor to be substantially flushed with the

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.