EXHIBIT 2002

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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KAWASAKI RAIL CAR, INC.,

Petitioner,

v.

SCOTT BLAIR,

Patent Owner

_____

Case IPR2017-00117

Patent 6,700,602

EXPERT DECLARATION OF JACK R. LONG

I.   INTRODUCTION

1.   I, Jack Long, have been retained by counsel for Scott Blair (hereinafter "Blair").

2.   I submit this declaration in support of Patent Owner's Preliminary Response to Petition for Inter Partes Review of 6,700,602, No. IPR 2017-01036.

II.   QUALIFICATIONS

3.   I hold a Bachelor of Science degree in Metallurgical Engineering from the University of Missouri.

4.   I was an Officer in the US Army Corps of Engineers with two years active duty as Lieutenant and five years reserve duty as a Captain.

5.   I have over 35 years of experience in various engineering, sales, and international positions, including as Chief Engineer and Senior VP International.

6.   I have supervised a staff of over 40 professionals in design engineering, testing, field service engineering and drafting.

7.   I am a recognized expert in the design and engineering of rolling stock including locomotive, passenger and freight vehicles ("rail cars") and their components and other areas of engineering and material science.

8.   I headed the sales and service engineering functions for proprietary rolling stock equipment.

9.   I was the transportation sales manager for a railway equipment company, and worked with major metro agencies and rolling stock builders.

10.   I was a program manager for designing and building the Washington D.C. metro cars.

11.   I am the inventor of eight issued United States Patents relating to various railway related engineering products, the design and engineering of rolling stock, their components and related devices.

12.   I was a Chief engineer for railway proprietary freight and passenger equipment.

13.   I have written and presented professional technical papers in seven countries.

14.   I am an inventor of U.S. Patent 9,395,276 entitled, "Method and system for detection and analysis of railway bogie operational problems.'

15. I am an inventor of U.S. Patent 6,422,154 entitled, "Three-piece railway truck frame having a selectively removable bolster."

16. I am an inventor of U.S. Patent 6,142,081 entitled, "Pedestal rocker seat for providing passive axle steering to a rigid railway truck."

17. I am an inventor of U.S. Patent 5,507,400 entitled, "Slackless drawbar or coupler with swivel mounting."

18. I am an inventor of U.S. Patent 5,463,964 entitled, "Rocker seat connection."

19. I am an inventor of U.S. Patent 5,139,161 entitled, "Automatic actuator for coupler knuckle-assembly of a railway passenger car."

20. I am an inventor of U.S. Patent 5,027,716 entitled, "Stabilized swing-motion truck for railway cars."

21. I am an inventor of U.S. Patent 4,744,308 entitled, "Combined center plate/center filler for railway freight cars."

III. MATERIALS CONSIDERED

22. I have reviewed the following:

    a.   U.S. Pat. No. 6,700,602 ("the '602 patent") including the claims thereof;

    b.   Petition for *Inter Partes* Review of U.S. Patent No. 6,700,602, No. OPR2017-01036 including Exhibits.

    c.   The translation of Japan Train Operation Association Magazine, Vol. 37, issue no. 3 (March 1, 1995) (Ex. 1003, "JTOA Magazine");

    d.   The translation of Japanese Publication No. 04-085379 (Ex. 1005, "Namikawa");

    e.   The translation of Japanese Publication No. 07-181900 (Ex. 1007, "Miyajima");

    f.   The translation of Japanese Publication No. 04-322579 (Ex. 1011, "Sasao");

    g.   U.S. Patent No. 5,293,244 to Kawaguchi (Ex. 1022, "Kawaguchi");

    h.   The translation of Japanese Publication No. 04-160991 (Ex. 1009, "Maekawa");

i.   The translation of Japanese Publication No. 02-23985 (Ex. 1021, "Amano');

j.   U.S. Patent No. 5,148,282 to Sedighzadeh (Ex. 1025, "Sedighzadeh");

k.   U.S. Patent No. 3,211,904 to Schwenkler (Ex. 1026, "Schwenkler");

l.   The translation of Japanese Publication No. 5-42853 (Ex. 1028, "Yamada");

m.   The file history of the '602 Patent provided in Ex. 1012; and

n.   The reexamination file history of the '602 Patent provided in Ex. 1013.

23.   I understand it has been stated that the following references are prior art to all of the claims of the '602 Patent:

a. JTOA Magazine;

b. Namikawa;

c. Miyajima;

d. Sasao;

e. Kawaguchi;

f. Maekawa;

g. Amano;

h. Sedighzadeh;

i. Schwenkler;

j. Yamada.

24.   In making my conclusions stated herein, while reviewing the materials listed in paragraphs 22 and 23, I have applied the claim construction definitions applied by Petitioner in its Petition for *Inter Partes* Review of U.S. Patent No. 6,700,602, No. IPR2017-01036.

25.   I understand that a claim is invalid for obviousness if the differences between the subject matter sought to be patented and the prior art are so insubstantial that the subject matter as a whole would have been obvious, at the time the invention was made, to a person having ordinary skill in the art to which that subject matter pertains.

26.   To the best of my understanding, my opinions regarding obviousness of the '602 Patent follow the legal principles contained in *Graham v. John Deere*, 383 U.S. 1 (1966) and *KSR Int'l Co. v. Teleflex, Inc.*, 550 U.S. 398 (2007).

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