UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

DYNACRAFT BSC, INC.,
Petitioner,

v.

MATTEL, INC.,
Patent Owner.

Case IPR2018-00038
Patent 7,222,684

DECLARATION OF JEFF REYNOLDS

I, Jeff Reynolds, declare to the best of my recollection as follows;

1. I worked at Fisher-Price in East Aurora, New York, from 1977 to 2015. I retired in 2015 and am currently retired. I was continuously employed at Fisher-Price for that entire period, except for 1985 to 1988, during which time I was at Hasbro.

2. From approximately 1995 to 2010, I was assigned to Fisher-Price's Power Wheels electromechanical group in the development of children's battery powered ride-ons.

3. I graduated from Worcester Polytechnic Institute in 1977 with a Bachelor of Science degree in Mechanical Engineering.

4. As over twenty years have passed since many of these events have transpired, the following reflects my best recollection regarding the events surrounding Power Wheels' development of a soft-start system: I started with the Power Wheels group as a manager for the electromechanical group in 1995. From my earliest times with the group, I recall being made aware of consumer complaints regarding the jerky on/off nature of Power Wheels vehicles. These vehicles had issues with electrical "in rush," as well as mechanical failures, due to the abrupt on/off nature of the electromechanical systems employed in these vehicles. Addressing these concerns was challenging in large part due to the cost constraints that these vehicles were manufactured under. To solve this, additional features were explored and needed to be developed in a way that did not add unacceptable levels of complexity and cost to the manufacturer and consumer.

5. Power Wheels as a group grappled with ways of dealing with these issues in a safe, and cost effective manner from my earliest time with the team. I recall different attempts to do so that were not successful, including efforts by my team to purchase motor controllers and incorporate them into prototype ride-ons.

6. At some point in those days, likely in the late 1990s or very early 2000s, I recall speaking with with Tony Norman from Innovation First to discuss speed control as a possible solution to these problems. Following on these conversations, Innovation First ended up designing speed control circuits for Power Wheels within Power Wheels' acceptable safety and performance parameters. To my recollection, this was the first acceptable electronic speed control system utilized in a Power Wheels vehicle that effectively slowed the time over which the motors reached full speed.

The forgoing is true and correct to the best of my recollection.

1-14-2018
Date

Jeff Reynolds