

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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mitsuba corporation and american mitsuba corporation

Petitioners

v.

INTELLECTUAL VENTURES II LLC

Patent Owner

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Case No.: IPR2017-\_\_\_\_\_

Patent No. 7,067,952

Title: Stator Assembly Made from a Molded  
Web of Core Segments and Motor Using Same

**DECLARATION OF DR. ITZHAK GREEN UNDER 37 C.F.R. § 1.68 IN  
SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF  
U.S. PATENT NO. 7,067,952**

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I, Dr. Itzhak Green, do hereby declare as follows:

**I. INTRODUCTION**

1. I have been retained as an expert witness on behalf of Mitsuba Corporation and American Mitsuba Corporation (collectively, “Mitsuba”) with respect to the above-captioned Petition for *Inter Partes* Review (“IPR”) of U.S. Patent No. 7,067,952, the (“’952 Patent”). I am being compensated for my time in connection with this IPR at my standard consulting rate of \$400 per hour. My compensation is not dependent on the substance of my opinions, my testimony, or the outcome of this IPR.
2. I have been asked to provide my opinions regarding whether Claims 10-12 (the “Challenged Claims”) of the ’952 Patent would have been anticipated or obvious to a person having ordinary skill in the art prior to the priority date of the ’952 Patent.
3. In preparing this Declaration, I have reviewed the ’952 Patent, the file history of the ’952 Patent, numerous prior art references, and other technical references from the time of the alleged invention.
4. I understand that claims in an IPR are given their broadest reasonable interpretation in view of the patent specification and the understandings of one having ordinary skill in the relevant art at the time of the alleged invention.

5. The '952 Patent states that it issued on June 27, 2006 from U.S. Patent Appl. No. 10/383,219 the ("219 Application"), filed on March 5, 2003. Ex. 1009 at 1. The '952 Patent states that it claims priority to U.S. Appl. No. 09/798,511, the ("511 Application") filed on March 2, 2001. (Ex. 1008 at 1.) As described in ¶¶ 41-43, it is my opinion that the Challenged Claims of the '952 Patent are not entitled to this March 2, 2001 priority date because the specification filed on March 2, 2001 does not provide support for the Challenged Claims. I understand that Intellectual Ventures II LLC ("IV") may claim that the priority date of the '952 Patent should be as early as March 2, 2001. The prior art I have based my opinions on predates March 2, 2001, and my opinions do not change should IV prove a March 2, 2001 priority date.
6. In forming the opinions expressed in this Declaration, I relied upon my education and experience in the relevant field of the art, and have considered the viewpoint of a person having ordinary skill in the relevant art as of March 5, 2003. I have also considered the viewpoint of a person having ordinary skill in the relevant art as of March 2, 2001. Should IV prove an earlier priority date of March 2, 2001, my opinions do not change.
7. My opinions are based, at least in part, on the following patents and printed publications, which I understand qualify as prior art:

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