

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

Before the Honorable Thomas B. Pender
Administrative Law Judge

In the Matter of

CERTAIN ROBOTIC VACUUM
CLEANING DEVICES AND
COMPONENTS THEREOF SUCH AS
SPARE PARTS

Inv. No. 337-TA-1057

RESPONDENTS' IDENTIFICATION OF EXPERT WITNESSES

Pursuant to Ground Rule 10 and the Procedural Schedule in this Investigation (Order No. 14), Respondents Shenzhen Zhiyi Technology Co., Ltd., BISSELL Homecare, Inc., Matsutek Enterprises Co., Ltd., Black & Decker Corporation, Black & Decker (U.S.) Inc., Shenzhen Silver Star Intelligent Technology Co., Ltd., bObsweep, Inc., bObsweep USA, Hoover Inc., Royal Appliance Manufacturing Co. d/b/a TTI Floor Care North America, Inc., and Suzhou Real Power Electronic Appliance Co., Ltd. (collectively, "Respondents") hereby identify the following experts from whom they may offer opinions or testimony in this Investigation.

Respondents may offer the testimony of one or more of these experts at the hearing for this Investigation either live, through witness statements, or by deposition, as the Administrative Law Judge permits. The identification of experts and expected areas of testimony are based on Respondents' ongoing investigation of evidence produced in this matter as of the date of this disclosure. Because discovery is still in an early stage, Respondents reserve the right to supplement its identification of experts and areas of testimony for the identified experts as additional information becomes available or as new issues arise.

Respondents also reserve the right to supplement or amend this list if an objection to one or more of these experts is raised by Complainant iRobot Corporation ("Complainant") and/or

sustained by the Administrative Law Judge. Respondents further reserve the right to (i) call at the hearing any expert witness that a party deposes; (ii) call at the hearing any expert witness identified by, or called to testify at the hearing by, Complainant; and (iii) call at the hearing impeachment witnesses not identified herein.

1. Richard M. Goodin

Goodin & Associates, Inc.
Apex, North Carolina

Mr. Goodin earned his Bachelor's degree in Electrical Engineering from the University of Delaware. Mr. Goodin is currently President and Chief Consultant for Goodin & Associates, Inc. Mr. Goodin may be called on to testify regarding the source code involved in this Investigation; the technical background of the Asserted Patents; the interpretation of claims in the Asserted Patents; the design, structure, function, and operation of the Accused Products and alleged Domestic Industry Products; the scope of the prior art; the invalidity, non-infringement, and unenforceability of the Asserted Patents as well as Complainant's positions on validity, enforceability, and/or infringement; and other related issues raised in connection with the claims and defenses raised in this Investigation. Mr. Goodin is expected to provide testimony at the hearing for this Investigation live and/or via deposition, as the Administrative Law Judge permits. Mr. Goodin is also expected to provide testimony in form of declarations in response to various pleadings and motions that may be filed in this Investigation addressing subject matter falling within Mr. Goodin's expertise, including any motions for summary determination. Mr. Goodin may also rebut the expert witness report(s) and testimony of Complainant's expert(s) as to the subject matter within Mr. Goodin's expertise. A copy of Mr. Goodin's *curriculum vitae* is attached hereto as Exhibit A.

2. Dr. Stephen Heppe
Telenergy, Inc.
Hood River, Oregon

Dr. Heppe earned his B.S.E.E. degree from Princeton University and M.S. and D.Sc. degrees in Electrical Engineering/Communications from George Washington University. Dr. Heppe is currently President of Telenergy, Inc. Dr. Heppe may be called on to testify regarding the technical background of the Asserted Patents; the interpretation of claims in the Asserted Patents; the design, structure, function, and operation of the Accused Products and alleged Domestic Industry Products; the scope of the prior art; the invalidity, non-infringement, and unenforceability of the Asserted Patents as well as Complainant's positions on validity, enforceability, and/or infringement; and other related issues raised in connection with the claims and defenses raised in this Investigation. Dr. Heppe is expected to provide testimony at the hearing for this Investigation live and/or via deposition, as the Administrative Law Judge permits. Dr. Heppe is also expected to provide testimony in form of declarations in response to various pleadings and motions that may be filed in this Investigation addressing subject matter falling within Dr. Heppe's expertise, including any motions for summary determination. Dr. Heppe may also rebut the expert witness report(s) and testimony of Complainant's expert(s) as to the subject matter within Dr. Heppe's expertise. A copy of Dr. Heppe's *curriculum vitae* is attached hereto as Exhibit B.

3. Dr. John Martens
Exponent Engineering & Scientific Consulting
Chicago, Illinois

Dr. Martens earned his Ph.D. degree in Electrical Engineering and Computer Science from Case Western Reserve University. Dr. Martens is currently a Principal Engineer at Exponent Engineering & Scientific Consulting. Dr. Martens may be called on to testify regarding the technical background of the Asserted Patents; the interpretation of claims in the Asserted

Patents; the design, structure, function, and operation of the Accused Products and alleged Domestic Industry Products; the scope of the prior art; the invalidity, non-infringement, and unenforceability of the Asserted Patents as well as Complainant's positions on validity, enforceability, and/or infringement; and other related; and other related issues raised in connection with the claims and defenses raised in this Investigation. Dr. Martens is expected to provide testimony at the hearing for this Investigation live and/or via deposition, as the Administrative Law Judge permits. Dr. Martens is also expected to provide testimony in form of declarations in response to various pleadings and motions that may be filed in this Investigation addressing subject matter falling within Dr. Martens's expertise, including any motions for summary determination. Dr. Martens may also rebut the expert witness report(s) and testimony of Complainant's expert(s) as to the subject matter within Dr. Martens' expertise. A copy of Dr. Martens' *curriculum vitae* is attached hereto as Exhibit C.

4. Dr. William Messner

Tufts University
Department of Mechanical Engineering
Medford, Massachusetts

Dr. Messner earned his Ph.D. degree in Mechanical Engineering from University of California, Berkeley. Dr. Messner is currently a Professor in the Department of Mechanical Engineering at Tufts University. Dr. Messner may be called on to testify regarding the technical background of the Asserted Patents; the interpretation of claims in the Asserted Patents; the design, structure, function, and operation of the Accused Products and alleged Domestic Industry Products; the scope of the prior art; the invalidity, non-infringement, and unenforceability of the Asserted Patents as well as Complainant's positions on validity, enforceability, and/or infringement; and other related issues raised in connection with the claims and defenses raised in this Investigation. Dr. Messner is expected to provide testimony at the hearing for this

Investigation live and/or via deposition, as the Administrative Law Judge permits. Dr. Messner is also expected to provide testimony in form of declarations in response to various pleadings and motions that may be filed in this Investigation addressing subject matter falling within Dr. Messner's expertise, including any motions for summary determination. Dr. Messner may also rebut the expert witness report(s) and testimony of Complainant's expert(s) as to the subject matter within Dr. Messner's expertise. A copy of Dr. Messner's *curriculum vitae* is attached as Exhibit D.

5. Dr. James L. Olivier
Olivier Consulting, Inc.
Dallas, Texas

Dr. Olivier is an expert in the field of electrical engineering, including computer and communication systems design. Dr. Olivier earned his B.S., M.S. and Ph.D. degrees in Electrical Engineering from Ohio State University. Dr. Olivier is currently Owner and Consultant for Olivier Consulting, Inc. and a Consultant for McAlexander Sound, Inc. Dr. Olivier may be called on to testify regarding the source code involved in this Investigation; technical background of the Asserted Patents; the interpretation of claims in the Asserted Patents; the design, structure, function, and operation of the Accused Products and alleged Domestic Industry Products; the scope of the prior art; the invalidity, non-infringement, and unenforceability of the Asserted Patents as well as Complainant's positions on validity, enforceability, and/or infringement; and other related issues raised in connection with the claims and defenses raised in this Investigation. Dr. Olivier is expected to provide testimony at the hearing for this Investigation live and/or via deposition, as the Administrative Law Judge permits. Dr. Olivier is also expected to provide testimony in form of declarations in response to various pleadings and motions that may be filed in this Investigation addressing subject matter

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