

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

United States Patent No.: 7,915,631	§	Attorney Docket No.:
Inventors: Yoshinori Shimizu, et al.	§	112868-0001-658
Formerly Application No.: 12/548,618	§	
Issue Date: March 29, 2011	§	Customer No.: 28120
Filing Date: August 27, 2009	§	
Former Group Art Unit: 2822	§	Petitioner: VIZIO, Inc.
Former Examiner: Michael Trinh	§	
	§	
	§	
	§	

For: LIGHT EMITTING DEVICE AND DISPLAY

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Patent Trial and Appeal Board
United States Patent and Trademark Office
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**SUPPLEMENTAL DECLARATION OF DR. ERIC BRETSCHNEIDER
IN SUPPORT OF PETITION FOR *INTER PARTES* REVIEW OF
UNITED STATES PATENT NO. 7,915,631**

I, Dr. Eric Bretschneider, hereby declare under penalty of perjury under the laws of the United States of America:

1. I have been retained by VIZIO, Inc. to submit this supplemental declaration in connection with the Petition for Inter Partes Review of claims 1-2 and 6-11 of U.S. Patent No. 7,915,631 (“the ’631 patent”) (Ex. 1001).

2. I am the same Eric Bretschneider who provided a Declaration in Case No. IPR2018-00066 executed on October 9, 2017 as Lowe’s Exhibit 1003 in that proceeding, which, including its appendix, is incorporated by reference herein in its entirety. Ex. 1003 (“First Declaration”), ¶¶ 1-205, Appendix A.

3. I have been informed that another IPR petition is to be filed against the ’631 patent, which will be accompanied by a copy of my First Declaration. Ex. 1003. I understand that the new petition will address the same claims of the ’631 patent using the same combinations of prior art as the petition set forth in IPR2018-00066. My First Declaration offered statements and opinions generally regarding the validity, prior art, obviousness considerations, and understanding of a person of ordinary skill in the art (“POSITA”) as it relates to the ’631 patent.

4. The opinions and statements I put forth in my First Declaration have not changed.

5. Attached hereto as Appendix A, is a true and correct copy of my Curriculum Vitae describing my background and experience.

6. Further information regarding my experience and qualifications are provided along with my First Declaration. Ex. 1003 (First Declaration), ¶¶ 1-13.

7. I am being compensated for my time at my standard consulting rate of \$400 per hour. I am also being reimbursed for expenses that I incur during the course of this work. My compensation is not contingent upon the results of my study, the substance of my opinions, or the outcome of any proceeding involving the challenged claims. I have no financial interest in the outcome of this matter or on the pending litigation between Petitioner and Patent Owner.

8. I reserve the right to supplement my opinions in the future to respond to any arguments that Patent Owner or its expert(s) may raise and to take into account new information as it becomes available to me.

9. I declare under penalty of perjury that the foregoing is true and correct.

10. Sworn to this 14th day of May, 2018
in Corinth, TX.



Eric Bretschneider, Ph.D.

APPENDIX A (CURRICULUM VITAE)

Skills Summary

- Successful Management and Team building with personnel at levels ranging from Sr. Scientists and Engineers to Technicians/Operators. Maximum Department size >100; Budget >\$25 million/yr.
- Strong New Product Development background; over 100 new SSL products taken from concept to manufacturing, including regulatory, Energy Star certification and DLC certification.
- Excellent communication skills sales and sale support experience as evidenced by development of new 8+ figure accounts for LED die, packages and applications. Proven ability to match customer demands/needs/desires with existing products.
- Comprehensive technical background in the full range of LED production technologies including MOCVD hardware/process, fabrication, LED chip/package test/reliability, optical design, thermal management, color conversion, SSL fixture/lamp design/integration and reliability.
- Direct Design and Development experience of LEDs (structures, die, packages) and SSL fixtures/components using TracePro and SolidWorks.

Employment

CTO; EB Designs & Technology Corinth, TX 2014 –

- Design and development of innovative solid-state lighting technology and designs, with a primary focus on optical design, thermal design and production/assembly technologies.
- Manage technology roadmap and draft IP disclosures/patent filings.
- Provide technical support and conduct research/technology development for clients in the field of solid state lighting. This work additionally includes serving as an expert witness.

Director of Engineering; HeathCo, LLC Bowling Green, KY 2013 – 2014

- Managed Engineering Department Staff (11 domestic, 14 international); Responsibilities included preparation and administration of the department budget (\$3.5 million annual). The department was charged with developed advanced technology/products related to: Solid State Lighting, Sensors, Notifications and Control Products and included regulatory/certifications for UL, FCC, Energy Star and DLC.
- Developed technology, IP and product roadmaps for all three business units (Lighting, Sensors, Notifications). Provided solid state lighting technology support for The Chamberlain Group.
- Additional responsibilities included establishing career development paths and training goals for all members of the department.
- Key accomplishments:
 - Led team for product recall issue dating back to 2006. Reduced recall scope (# units) by >80% and financial exposure by >85% through detailed investigation and analysis of production records and analysis of excess and obsolete inventory.
 - Completed review for entire product portfolio to comply with new cUL bi-lingual language requirements. Project required warning requirement changes to physical components (tooling), warning labels, documents and packaging on >400 products.

Elec Tech International Zhuhai, Guangdong Province, P.R. China

Chief Engineer ETi Lighting Research Institute VP Research & Development ETi Solid State Lighting

2011 – 2013

- Managed Engineering and R&D staff for newly formed vertically integrated LED company (107 Engineering, Scientists, Designers); responsibilities included preparation and administration of the department budget (>\$25 million annual)
- Worked directly with President and CEO of the company to develop IP and product roadmaps for all LED based lighting products/projects for markets in the US, Europe, Japan and China.
- Key accomplishments:

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