

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

Jubilant DraxImage Inc.

Petitioner

v.

Bracco Diagnostics Inc.

Patent Owner

U.S. Patent No. 9,299,467

Inter Partes Review Case No.: IPR2018-01449

EXHIBIT 1015

DECLARATION OF ROBERT T. STONE, Ph.D.

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I, Robert T. Stone, declare as follows:

I. INTRODUCTION AND QUALIFICATIONS

1. I understand that Jubilant DraxImage, Inc. (“Petitioner”) is petitioning the United States Patent and Trademark Office (“USPTO”) for *inter partes* review of claims 1-4, 6-16, and 18-22 (the “Challenged Claims”) of U.S. Patent No. 9,299,467 (“the ’467 Patent”). I have been retained by Petitioner to offer technical opinions relating to the ’467 Patent and certain prior-art references relating to its subject matter.

2. I received a B.S. in Electrical Engineering from Virginia Polytechnic Institute and State University (“Virginia Tech”) in 1977; an M.S. with distinction in Electrical Engineering from Virginia Polytechnic Institute and State University in 1979; and a Ph.D. in Electrical Engineering from Stanford University in 1981. After receiving my Ph.D., I worked as an Assistant Professor of Engineering at Virginia Polytechnic Institute and State University until 1983. Since that time, I have worked continuously in industry in the field of medical electronics systems and instrumentation. Since 2004, I have served as Chief Technical Officer or Chief Executive Officer of various entities, where I have been responsible for virtually all phases of product development including concept definition, prototyping, design, evaluation, patenting, and technology licensing for various medical devices.

3. I spent six years in the United States Navy between 1965 and 1971 where I worked as a nuclear reactor operator, electronics technician, and engineering watch supervisor. During this time I achieved the rank of Electronics Technician (Nuclear) First Class (E-6). I spent two of these years as an instructor in nuclear theory and instrumentation at the Navy's Schenectady New York Nuclear Power Prototype facility.

4. While pursuing my degrees at Virginia Tech, I managed and maintained a research and teaching nuclear reactor which routinely performed neutron activation analysis as a research service to university, state, and industry laboratories. In this role I participated in the University Safety Committee and the Reactor Safety Committee, directly interfaced with the Nuclear Regulatory commission, and was responsible for compliance with all applicable nuclear device regulations.

5. After obtaining my Ph. D. in electrical engineering from Stanford University in 1981, I returned to Virginia Tech where I served as an Assistant Professor of Engineering. In addition to my teaching responsibilities, I was responsible for obtaining research funding for the analysis of control systems for nuclear reactors. Thus, I am familiar with safety protocols for nuclear materials.

6. I have over 35 years of experience designing and developing medical devices, electronic systems, and instrumentation, including significant experience with computer-controlled drug-delivery systems.

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