

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

LKQ Corporation and Keystone Automotive Industries, Inc.,

Petitioners,

v.

GM Global Technology Operations LLC,

Patent Owner.

IPR2020-00534

U.S. Design Patent No. D797,625 S

**DECLARATION OF BARRY F. IRWIN, P.C. IN SUPPORT OF
PETITIONERS' REPLY TO PATENT OWNER'S RESPONSE**

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Ex. 1045 LKQ v. GM

IPR2020-00534

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I, Barry F. Irwin, declare as follows:

1. The facts set forth herein are based on my personal knowledge and/or the documents attached hereto (that I have personal knowledge of sufficient to authenticate them), and are true and correct to the best of my personal knowledge, belief, recollection, and understanding.
2. I am over the age of eighteen, and if asked to do so, I could competently testify to the matters set forth herein.
3. I am the founding attorney at Irwin IP LLC, 222 South Riverside Plaza, Suite 2350, Chicago, Illinois 60606, and serve as Lead Counsel for the Petitioners, LKQ Corporation's and Keystone Automotive Industries, Inc., in this proceeding. I submit this declaration in support of Petitioner's Reply to Patent Owner's Response.
4. Submitted herewith as Exhibit 1017 is a true and correct copy of U.S. Design Patent No. D766,149.
5. Submitted herewith as Exhibit 1018 is a true and correct copy of U.S. Design Patent No. D704,607.
6. Submitted herewith as Exhibit 1019 is a true and correct copy of U.S. Design Patent No. D763,753.
7. Submitted herewith as Exhibit 1020 is a true and correct copy of U.S. Design Patent No. D686,536.

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8. Submitted herewith as Exhibit 1021 is a true and correct copy of U.S. Design Patent No D692,798.
9. Submitted herewith as Exhibit 1022 is a true and correct copy of U.S. Design Patent No. 762,151.
10. Submitted herewith as Exhibit 1023 is a true and correct copy of U.S. Design Patent No. D713,298.
11. Submitted herewith as Exhibit 1024 is a true and correct copy of U.S. Design Patent No. D764,362.
12. Submitted herewith as Exhibit 1025 is a true and correct copy of U.S. Design Patent No. D785,521.
13. Submitted herewith as Exhibit 1026 is a true and correct copy of U.S. Design Patent No. D739,306.
14. Submitted herewith as Exhibit 1027 is a true and correct copy of U.S. Design Patent No. D722,282.
15. Submitted herewith as Exhibit 1028 is a true and correct copy of U.S. Design Patent No. D784,857.
16. Submitted herewith as Exhibit 1029 is a true and correct copy of U.S. Design Patent No. D613,645.
17. Submitted herewith as Exhibit 1030 is a true and correct copy of U.S. Design Patent No. D611,387.

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18. Submitted herewith as Exhibit 1031 is a true and correct copy of U.S. Design Patent No. D704,103.
19. Submitted herewith as Exhibit 1032 is a true and correct copy of U.S. Design Patent No. D717,696.
20. Submitted herewith as Exhibit 1033 is a true and correct copy of U.S. Design Patent No. 692,798.
21. Submitted herewith as Exhibit 1034 is a true and correct copy of U.S. Design Patent No D680,909.
22. Submitted herewith as Exhibit 1035 is a true and correct copy of U.S. Design Patent No. D615,458.
23. Submitted herewith as Exhibit 1036 is a true and correct copy of U.S. Design Patent No. D699,629.
24. Submitted herewith as Exhibit 1037 is a true and correct copy of U.S. Design Patent No. D781,180.
25. Submitted herewith as Exhibit 1038 is a true and correct copy of U.S. Design Patent No. D635,488.
26. Submitted herewith as Exhibit 1039 is a true and correct copy of U.S. Design Patent No. D773,361.
27. Submitted herewith as Exhibit 1040 is a true and correct copy of U.S. Design Patent No. D699,649.

28. Submitted herewith as Exhibit 1041 is a true and accurate collage depicting images of the “crowded field” prior art patents cited as “most similar” in the Declaration of T. Peters, the images comprising which were each obtained from U.S. Design Patent No. D797,625, U.S. Design Patent D773,340, and the aforementioned Exhibits 1017–1022.
29. Submitted herewith as Exhibit 1042 is a true and accurate collage depicting images of the “crowded field” prior art patents cited in the Declaration of T. Peters, the images comprising which were each obtained from U.S. Design Patent No. D797,625, U.S. Design Patent No. D773,340, and the aforementioned Exhibits 1023–1042.
30. Submitted herewith as Exhibit 1043 is a true and accurate copy of the Declaration of Jason C. Hill in Support of Petitioners’ Reply to Patent Owner’s Response.
31. Submitted herewith as Exhibit 1044 is a true and accurate copy of the transcript of the Deposition of Thomas V. Peters.

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