

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YITA LLC,
Petitioner

v.

MACNEIL IP LLC,
Patent Owner

Case IPR2020-01139
U.S. Patent No. 8,382,186

**DECLARATION OF PAUL E. KOCH, PH.D. IN SUPPORT OF
PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE**

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TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	LEVEL OF ORDINARY SKILL IN THE ART	2
III.	UNDERSTANDING OF THE LAW	4
IV.	OVERVIEW OF THE '186 PATENT AND THE '834 PATENT	4
V.	MATERIALS CONSIDERED	4
VI.	Claim Construction	18
VII.	The Rabbe-Yung-Gruenwald combination discloses every element of the claims.	20
A.	Rabbe discloses the conformance limitations of the '186 and the '834 patents.....	21
1.	A POSA would have understood both Rabbe translations as disclosing the conforming limitations.	22
a.	MacNeil's declarants do not account for Rabbe's teachings as a whole, which disclose the conforming limitations.....	22
b.	MacNeil's translation of Rabbe includes these same teachings that disclose the conforming limitations.	26
c.	Rabbe's conformance is not limited to a top perimeter of the raised edges.	27
d.	The two Rabbe translations, considered alone or together, confirm my original opinion about Rabbe's disclosure.	37
e.	The background art confirms that a POSA would have understood Rabbe as I explained in my original declarations.	43
2.	MacNeil's comparisons of Rabbe's illustrations to the Lada Niva are irrelevant.	46
B.	The Rabbe-Yung-Gruenwald combination discloses a thermoformed floor tray with integrally formed panels.	50
1.	Rabbe's floor tray is a single, integral material conducive to thermoforming and closely conforming to a vehicle footwell.	52
a.	Rabbe does not disclose a floor tray assembled by multiple pieces.....	52
b.	The purpose of Rabbe's floor tray would have suggested using a single, integral material.....	54

c.	The properties of Rabbe’s floor tray would have suggested using a thermoplastic material conducive to thermoforming. ..57	57
d.	Rabbe is not limited to thermosets	60
e.	Rabbe’s floor tray does not preclude thermoforming.....	65
2.	Yung is not limited to compression molding.....	68
a.	Foam sheets were regularly thermoformed without losing their waterproof characteristic.....	69
b.	Laminate products were regularly thermoformed.....	75
c.	Yung’s embossing suggests thermoforming.	78
d.	Yung’s materials would have provided the appropriate amount of elasticity and abrasion resistance.....	80
e.	Yang’s mention of compression molding confirms that Yung is not intended to be limited to compression molding....	81
3.	Gruenwald’s thermoforming techniques were applicable to Rabbe’s floor tray	82
VIII.	A POSA would have been motivated to combine Rabbe, Yung, and Gruenwald to provide a thermoformed floor tray with integrally formed panels.....	84
A.	A POSA would have multiple rationales for combining the teachings of Rabbe, Yung, and Gruenwald.	85
1.	Combining Yung’s thermoplastic materials with Rabbe would yield a waterproof floor tray with sufficient rigidity and pliability.....	85
2.	Using Yung’s thermoplastic materials with Gruenwald’s thermoforming techniques would be the most cost-effective way of manufacturing Rabbe’s floor tray.	87
3.	Combining Gruenwald’s thermoforming techniques with Rabbe and Yung would improve the structural integrity of the floor tray.....	90
B.	MacNeil’s arguments against combining Rabbe with Yung and Gruenwald are premised on inaccurate technical assertions and mischaracterizations of the references.....	91
1.	Rabbe is not limited to thermosets.	92

2.	The thermoplastic materials in Yung’s floor mat are well suited for Rabbe’s floor tray and thermoforming.....	93
3.	The foam particles in Yung’s floor mat do not teach away from Rabbe’s custom-fit design.....	95
4.	Gruenwald’s thermoforming techniques for heavy-gauge products would impart sufficient flexibility for Rabbe’s floor tray.....	97
5.	The design of Rabbe’s floor tray does not teach away from using Gruenwald’s thermoforming techniques.	99
IX.	A POSA would have reasonably expected success in achieving the claimed invention.	101
X.	MacNeil’s evidence of secondary considerations lacks a nexus to the claimed invention and does not overcome the obviousness position I set forth in my original declaration.....	104
A.	There is not a nexus between the claimed invention and MacNeil’s products.	105
B.	MacNeil did not adequately define a relevant market to show commercial success.....	107
C.	MacNeil’s industry praise evidence does not show nonobviousness.	108
D.	MacNeil’s claimed invention did not solve a long felt need.	109
E.	MacNeil’s licensing evidence does not show nonobviousness.	109
XI.	CONCLUSION	110

I, Paul E. Koch, Ph.D., declare as follows:

I. INTRODUCTION

1. I have been retained as an expert in this proceeding by counsel for Yita LLC (“Yita”). I previously submitted declarations (EX1003 in each proceeding) in support of the petitions for *inter partes* review of U.S. Patent No. 8,382,186 (“the ’186 patent”) in IPR2020-01139 and of U.S. Patent No. 8,833,834 (“the ’834 patent”) in IPR2020-01142. This declaration is in support of Petitioner’s Replies to Patent Owner’s Responses in the same proceedings, IPR2020-01139 and IPR2020-01142.

2. My background and qualifications were provided in paragraphs 4-15 of my original declarations, Exhibit 1003, and my CV was submitted as Exhibit 1032 in each proceeding. My statements in my original declaration regarding my review of the ’186 patent, the ’834 patent, and related materials remain unchanged. In reaching my opinions here, I reviewed the Patent Owner Responses, the Petitions, my original declarations, and the materials reviewed as part of my original declarations.

3. I have also reviewed all other materials cited herein.

4. I am being compensated for my work on this case at my standard rate of \$375 per hour, with reimbursement for actual expenses. My compensation is not dependent upon my opinions, my testimony, or the outcome of this case.

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