UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YITA LLC Petitioner

v.

MACNEIL IP LLC
Patent Owner

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

DECLARATION OF DAN PERREAULT IN SUPPORT OF PETITIONER'S REPLY TO PATENT OWNER'S RESPONSE

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	A.	Portable coordinate measuring machines were readily available and commonly used in the automobile industry as of 200416		
	B.	Computer-aided design software was readily available and commonly used to convert scan data to make an accurate mold as of 2004.		
VI.	A POSA would have had an expectation of success in combining Rabbe, Yung, and Gruenwald to achieve the conformance limitations3			
VII. All the steps of MacNeil's mold making method were commetechniques used in prototyping automobile accessories		e steps of MacNeil's mold making method were common iques used in prototyping automobile accessories		
	A.	Obtaining accurate three-dimensional positional data of complex surfaces, including a vehicle foot well surface, was well within the level of ordinary skill in the art as of 200438		
	B.	Converting three-dimensional positional data into a CAD model for producing a custom fit mold surface was well within the level of ordinary skill in the art as of 2004		



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VIII.	A POSA in 2004 would have been able to easily scan the Lada Niva				
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LIST OF MATERIALS CONSIDERED

Case No.	Exhibit/Pa per No.	Description
IPR2020-01139	3	Petition for <i>Inter Partes</i> Review of U.S. Patent No. 8,382,186
IPR2020-01139	17	Decision Granting Inter Partes Review
IPR2020-01139	29	Patent Owner's Response (Redacted)
IPR2020-01142	3	Petition for <i>Inter Partes</i> Review of U.S. Patent No. 8,833,834
IPR2020-01142	17	Decision Granting Inter Partes Review
IPR2020-01142	28	Patent Owner's Response (Redacted)
IPR2020-01139	1001	U.S. Patent No. 8,382,186 to MacNeil et al., issued February 26, 2013 ("'186 Patent")
IPR2020-01142	1001	U.S. Patent No. 8,833,834 to MacNeil et al., issued September 16, 2014 ("'834 Patent")
IPR2020-01139	1003	Declaration of Paul E. Koch, Ph.D.
IPR2020-01142	1003	Declaration of Paul E. Koch, Ph.D.
IPR2020- 01139, -01142	1005	French Patent Application Pre-Grant Publication No. 2547252 to Rabbe, published December 14, 1984, with attached certified English-language translation ("Rabbe")
IPR2020- 01139, -01142	1006	U.S. Patent Application Pre–Grant Publication No. 2002/0045029 A1 to Yung, published April 18, 2002 ("Yung")
IPR2020- 01139, -01142	1007	Gruenwald, G., <i>Thermoforming: A Plastics Processing Guide</i> , CRC Press, 2nd Edition, 1998 ("Gruenwald")
IPR2020-01142	1011	U.S. Patent No. 2,657,948 to Sturtevant, issued November 3, 1953 ("Sturtevant")
IPR2020- 01139, -01142	1045	Curriculum vitae of Dan Perreault
IPR2020- 01139, -01142	1047	Transcript of the Deposition of Ray Sherman, taken July 28, 2021
IPR2020- 01139, -01142	1049	Transcript of the Deposition of Tim A. Osswald, Ph.D., taken August 5, 2021
IPR2020- 01139, -01142	1060	FaroArm Titanium & Platinum Brochure, revised July 30, 2004



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		Declaration of Dan Terreaut
Case No.	Exhibit/Pa per No.	Description
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IPR2020-	1074	U.S. Patent No. 3,944,798 to Eaton
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IPR2020-	1076	U.S. Patent No. 5,528,505 to Granger et al.
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IPR2020-		"Coordinate Measuring Machine has portable
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		https://news.thomasnet.com/fullstory/coordinate-
		measuring-machine-has-portable-design-455365
IPR2020-	1080	U.S. Patent No. 5,363,159 to Melvin
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IPR2020-	1081	International Patent Publication No. WO 99/25536
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IPR2020-	1082	U.S. Patent No. 6,377,865 to Edelsbrunner et al.
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IPR2020-	1083	Geomagic Studio product sheet, 2003
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IPR2020-	1086	U.S. Patent No. 4,575,330 to Hull
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IPR2020-	1000	IMEdit TM Polygon-editing Software Reference
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IPR2020-		Software Inc., July 2003.
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