

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

YITA LLC,
Petitioner,

v.

MACNEIL IP LLC,
Patent Owner.

SECOND SUPPLEMENTAL DECLARATION OF TIM A. OSSWALD

I, Tim A. Osswald, declare as follows:

1. Unless otherwise stated, the facts stated in this Declaration are based on my personal knowledge.

2. I understand that Patent Owner was permitted to file additional evidence in support of its position. I have been asked to update my declaration to include citations to the newly admitted evidence.

3. My declaration, submitted as Exhibit 2041 in IPR2020-01139 and IPR2020-01142, documents my opinions in connection with these proceedings.

4. Exhibit 2126 is a Corrected Declaration of Ryan Granger (REDACTED). I have reviewed Exhibit 2126.

5. Exhibit 2137 is a Chinese Patent Application No. 87212432 to Yang, filed July 29, 1998, with attached certified English-language translation. I have reviewed Exhibit 2137.

6. Attached as Appendix A to this declaration is a table of the citations in Exhibit 2041, comparing original citations containing Exhibits 2023 or 2042 to updated citations including Exhibits 2126 or 2137. The updated citations in Appendix A replace the original citations in the referenced portion of Exhibit 2041.

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

Executed this 31 day of August, 2021.



Tim A. Osswald

APPENDIX A

EX2041 Citation Updates		
Page	Original Citation	Updated Citation
<i>Exhibit List</i>	N/A	2126 Corrected Declaration of Ryan Granger (REDACTED)
<i>Exhibit List</i>	N/A	2137 Chinese Patent Application No. 87212432 to Yang, filed July 29, 1998, with attached certified English-language translation
97	EX2042, ¶¶95-116.	EX2042, ¶¶95-116; EX2126, ¶¶95-116.
103	EX2042, ¶¶117-165.	EX2042, ¶¶117-165; EX2126, ¶¶117-165.
104	Lada Niva Seats. EX2042, ¶135.	Lada Niva Seats. EX2042, ¶135; EX2126, ¶135.
110	EX2023, 7.	EX2023, 7; EX2137, 7.
113	EX2012, Cover Page; EX2023, 1.	EX2012, Cover Page; EX2023, 1; EX2037, 1.
113	EX2023, 2.	EX2023, 2; EX2037, 2.
114	EX2023.	EX2023; EX2137.
114	EX2023, 3.	EX2023, 3; EX2137, 3.
115	EX2023, 3 (Chinese Abstract of the Creation); <i>see also id.</i> , 6 (describing using “compression molding technology” to form the floor mat), 7 (describing “molding” the three layers “by the compression molding technology”), 10	EX2023/EX2137, 3 (Chinese Abstract of the Creation); <i>see also id.</i> , 6 (describing using “compression molding technology” to form the floor mat), 7 (describing “molding” the three layers “by the compression molding technology”), 10 (claiming a structure for a vehicle

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