

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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MEDTRONIC, INC., AND MEDTRONIC VASCULAR, INC.,

Petitioner,

v.

TELEFLEX LIFE SCIENCES LIMITED,

Patent Owner

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**DECLARATION OF MICHAEL JONES  
SUBMITTED IN SUPPORT OF PETITIONER'S REPLIES AND  
PETITIONER'S OPPOSITION TO PATENT OWNER'S MOTION TO  
AMEND**

IPR2020-01341  
IPR2020-01342  
U.S. Pat. No. 8,142,413

IPR2020-01343  
IPR2020-01344  
U.S. Pat. No. RE 46,116

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## **I. Introduction**

1. I have been retained by Robins Kaplan LLP on behalf of Medtronic, Inc. and Medtronic Vascular, Inc. (“Medtronic”) as an independent expert.

2. I am informed that Medtronic intends to use my opinions in support of petitions pending at the Patent Trial and Appeal Board (“PTAB”) concerning U.S. Patent Nos. 8,142,413, and RE46,116 (the “Teleflex Patents”): IPR2020-01341, IPR2020-01342, IPR2020-01343, IPR2020-01344.

3. I have been asked to provide my opinion on the disclosures of certain patents and articles in view of the knowledge of a POSITA as of the date of invention of the Teleflex Patents.

4. I am informed that the parties dispute the date of invention of the patents that are the subject of the IPRs. My opinions herein are the same whether the relevant date is May 3, 2006 or early 2005.

5. I make this Declaration based on my personal education, experience, and knowledge of medical device product development since the mid-1980s. I have also reviewed the materials cited herein.

## **II. Qualifications**

6. My curriculum vitae is attached as Appendix A.

7. I received a Bachelor of Science degree in Chemical Engineering from the University of California, Berkeley in 1984. I later earned a Master of

Science degree in Engineering, Mechanics and Materials, in 1995 from California State University, Long Beach.

8. From the mid-1980s through the late-1990s I worked as an engineer responsible for various aspects of medical device design, development, and manufacturing for products that included catheters for treating thrombo-embolic stroke, catheters for treating subarachnoid hemorrhage, balloon catheters for treating vascular spasm (Micro Therapeutics, Inc.), an electrosurgical balloon catheter and a ureteral stent product line (Applied Medical Resources), urological balloon catheters (Baxter Healthcare), embolectomy catheters, endo tracheal and tracheostomy tubes, and angioplasty catheters (Shiley).

9. Since 1997, I have worked at Design Development and Fabrication, Inc. in contract mechanical engineering, focused on product design and development. My projects included prototype designs for minimally invasive, surgical, and implantable devices, development and fabrication for surgical devices, test fixture design and fabrication, and process validation in support of PMA filings. Clients included: Edwards Lifesciences Inc., SenoRx Inc, Vascular Control Systems Inc., Micro Therapeutics and Neuroperfusion.

10. Over the course of my work, I have been named as an inventor on over 100 patents.

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