

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

**MEDTRONIC COREVALVE LLC, EDWARDS LIFESCIENCES
CORPORATION, AND
EDWARDS LIFESCIENCES LLC,**

Petitioner,

v.

COLIBRI HEART VALVE, LLC,

Patent Owner.

Case IPR2020-01454¹

U.S. Patent No. 9,125,739

**DECLARATION OF DR. WILLIAM J. DRASLER IN SUPPORT OF
PETITIONER'S REPLY TO PATENT OWNER RESPONSE**

¹ Edwards Lifesciences Corporation and Edwards Lifesciences LLC filed a petition in IPR2021-00775, and have been joined as petitioners in this proceeding.

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I, Dr. William J. Drasler, have previously been asked to testify as an expert witness in this action. As part of my work in this action, I have been asked by Petitioner to respond to certain assertions by Patent Owner and assertions and opinions from Dr. Lakshmi Prasad Dasi regarding obviousness, including secondary considerations. I hereby declare under penalty of perjury under the laws of the United States as follows:²

I. INTRODUCTION

1. I am the same William J. Drasler who provided a declaration for this matter executed on September 1, 2020 (Ex. 1002 (“Drasler Decl.,” “Declaration”)).

2. My experience, qualifications, and compensation are provided in my September 1, 2020 Declaration and my curriculum vitae. Drasler Decl., ¶¶7-19, Appendix B. In this Declaration, I have been asked to respond to certain assertions raised by Patent Owner in its Patent Owner’s Response (“POR”) (Paper 14) and by Dr. Lakshmi Prasad Dasi in his supporting declaration (Ex. 2019 (“Dasi”)).

3. I understand that, in this proceeding, the Board has instituted *Inter Partes* Review proceedings based on the following grounds as set forth in my Declaration (Drasler Decl., ¶¶70-226):

² Throughout this Declaration, all emphasis and annotations are added unless noted.

Ground	Claim(s) Challenged	Reference(s)/Basis
1	1-5	Garrison
2	1-5	Garrison, Leonhardt
3	1-5	Garrison, Nguyen
4	1-5	Garrison, Leonhardt, Nguyen
5	1-3, 5	Andersen, Limon, Gabbay
6	1-3, 5	Andersen, Limon, Phelps
7	1-3, 5	Andersen, Limon, Phelps, Nguyen
8	4	Andersen, Limon, Gabbay, Garrison
9	4	Andersen, Limon, Phelps, Garrison
10	4	Andersen, Limon, Phelps, Nguyen, Garrison

4. In reaching the conclusions described in this Declaration, I have relied on the documents and materials cited herein as well as those cited within and identified in my prior Declaration (*see* Drasler Decl., Appendix A). I have also considered the documents and materials cited in the POR and the documents cited by Dr. Dasi. A complete listing of all materials upon which I have relied upon in formulating my opinion are included in Appendix C attached hereto.

5. As further discussed below, Dr. Dasi's opinions generally repeat the arguments made by Patent Owner in the POR and vice-versa. I disagree with Dr. Dasi's opinions for the same reasons that I disagree with the corresponding assertions in the POR and vice-versa.

6. My opinions are also based upon my education, training, research, knowledge, and personal and professional experience.

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