

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ADVANCED ENERGY INDUSTRIES INC.,
PETITIONER,

v.

RENO TECHNOLOGIES INC.,
PATENT OWNER.

Case IPR2021-01397
Patent 10,707,057

**DECLARATION OF DENIS SHAW
IN SUPPORT OF PETITION FOR INTER PARTES REVIEW OF U.S.
PATENT NO. 10,707,057**

I, Denis Shaw, hereby declare as follows:

I. INTRODUCTION

1. I am over the age 18 and can competently testify to the facts set out in this declaration.

2. Unless otherwise indicated below, the statements in this declaration are based upon my personal knowledge and beliefs.

3. I am currently Vice President, Integrated Solutions at Advanced Energy Industries, Inc. ("AEI"). In the 2012 timeframe addressed in this declaration, my title was Director of Worldwide Applications Technology at AEI.

4. In my role with AEI, I often attend conferences and trade shows to market new products and technology developed by AEI. One such event that I personally attended was SEMICON West 2012, held July 12-14, 2012, at the Moscone Center in San Francisco, CA. SEMICON West is a large annual global tradeshow and conference for the semiconductor and microelectronics industry.

5. In 2012, I believe SEMICON West would have been attended by well over ten thousand people in the industry. The attendees would have included many engineers, physicists, and other scientists, including those who worked for AEI's competitors and customers, interested to learn about the latest technology in the semiconductor industry. I have a PhD in electrical engineering with over 20 years of industry experience and met with many others at SEMICON West 2012 having

similar levels of knowledge and experience, including those with expertise in radio frequency match networks used with plasma processing applications.

6. Like many other companies at SEMICON West 2012, AEI had a booth to market AEI products to potential customers or other interested parties that were in attendance. One of the products prominently displayed and marketed at AEI's booth at SEMICON West 2012 was the Navigator[®] II matching network. As part of the marketing focus on Navigator[®] II, AEI created a Navigator[®] II matching network poster, including a three foot by four foot version to display at the show. I worked in AEI's booth all three days over July 10-12, 2012 where the Navigator[®] II poster was on display all three days.

7. The Navigator[®] II poster would have been highly visible to all SEMICON West 2012 attendees visiting AEI's booth or those simply walking past in the nearby public areas as the purpose was to market the Navigator[®] II products to the attendees. All attendees at the conference, including AEI's competitors, could have viewed and copied the Navigator[®] II poster, including writing down notes. There were no restrictions or conditions on viewing the Navigator[®] II poster such as private showings, non-disclosure agreements, or otherwise. I openly discussed the Navigator[®] II product, including the various details and performance attributes shown on the poster, with many interested attendees.

8. The Navigator[®] II poster was printed from a .pdf file. I coordinated having the .pdf file of the Navigator[®] II poster and related information emailed to interested parties for follow-up discussions. I also provided this .pdf file of the Navigator[®] II poster to the attorneys for AEI, which I understand is used as an exhibit in the *inter partes* review petition with which this declaration will be submitted.

STATEMENT UNDER 18 U.S.C. § 1001

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statements made of my own knowledge are true and that all statements made on information and believe are believed to be true. I understand that willful false statements are punishable by fine or imprisonment or both. *See* 18 U.S.C. § 1001.



Denis Shaw