

**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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APEX TOOL GROUP, LLC,  
Petitioner,

v.

MILWAUKEE ELECTRIC TOOL CORPORATION,  
Patent Owner.

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Case No. PGR2020-00056  
Patent 10,422,617

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**DECLARATION OF DR. KIMBERLY K. CAMERON**

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I, Dr. Kimberly K. Cameron, hereby declare as follows:

**I. ENGAGEMENT**

1. I have been retained by Milwaukee Electric Tool Corporation (“Patent Owner”) in connection with a post-grant review (PGR) petition that was filed challenging the validity of claims 1-11 of U.S. Patent No. 10,422,617 (the “’617 patent”). I understand that the PGR petition at issue here was filed by Apex Tool Group, LLC (“Petitioner”). I also understand that the ’617 patent is assigned to Patent Owner.

2. I have been asked by Patent Owner at this stage to offer opinions concerning Figure 6 in the ’617 patent and concerning Petitioner’s proposal to modify U.S. Patent No. 6,324,769 to Murray (Ex. 1010) in challenging the claims of the ’617 patent. This declaration sets forth the opinions I have reached to date regarding these matters.

3. I am being compensated by Patent Owner at my standard hourly consulting rate of \$410 for my time spent on this matter. My compensation is not contingent on the outcome of the PGR or on the substance of my opinions.

4. I have no financial interest in Petitioner or Patent Owner.

## **II. BACKGROUND**

5. As I have summarized below, my academic education and engineering career have prepared me well to testify on matters related to the '617 patent.

### **A. My Academic Education as a Mechanical Engineer**

6. I earned a B.S.E. degree in Mechanical Engineering in 1999 from Princeton University with certificates in Applied Mathematics, Engineering Physics and Materials Science. I then earned my M.S. degree in Mechanical Engineering in 2000 from Stanford University. I also earned my Ph.D. degree in Mechanical Engineering from Stanford University in 2004 with a minor in Materials Science.

### **B. My Engineering Career and Relevant Engineering Project Examples**

7. I am a Principal for Engineering Systems Inc. (ESi) in the Mechanics and Materials practice. ESi is an engineering and scientific investigation and analysis firm committed to providing clear answers to the most challenging technical problem. At ESi, I specialize in mechanical engineering and metallurgy and have extensive experience with mechanical design, stress analysis, failure analysis, and risk assessments of engineering structures and components.

8. I have conducted hundreds of investigations on a wide variety of engineering structures, from miniature biomedical devices to large-scale process

equipment. I have also consulted on the design and manufacturability of various mechanical devices with actuators. The common thread in each of my investigations is the application of the fundamentals of engineering mechanics, metallurgy, materials science, engineering physics, and computational mathematics to help understand and solve complex problems.

9. Examples of hand tools and other similar mechanical technologies that I have worked on during my engineering career include: gears, bearings, clamps, saws, many different types of surgical tools, many different kinds of fasteners, tension meters, power-driver screwdrivers, measuring devices using gyroscopes, utility knives, staplers, safety glasses, and many others. In successfully designing these various tools, I dealt with and resolved numerous engineering challenges, including manufacturing issues, issues related to the mechanics of materials, stress analysis issues, issues related to ergonomics, issues related to mechanical vibrations, and other human factors generally relevant to the design and end-consumer use of these tools.

10. I have also taught classes for engineers preparing to take the Fundamentals of Engineering exam and the Professional Engineering licensing examination in both Civil Engineering and Mechanical Engineering.

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