IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

PATENT TRIAL AND APPEAL BOARD

DIGITAL CHECK CORP. d/b/a ST IMAGING
Petitioner

v.

E-IMAGEDATA CORP.
Patent Owner

CASE: IPR2017-00178
U.S. PATENT NO. 9,179,019

DECLARATION OF ANTHONY J. SENN, P.E.

1. I, Anthony J. Senn, P.E., do hereby declare and say:

2. I am over the age of twenty-one (21) and competent to make this declaration. I am also qualified to give testimony under oath. The facts and opinions listed below are within my personal knowledge.

3. I am being compensated for my time in this matter at my typical hourly consulting rate. My compensation in no way depends on the outcome of this proceeding or the content of my opinions.

4. I have been asked to review certain documents, including U.S. Patent No. 9,179,019 (which I refer to as the '019 Patent) (Ex. 1001), and to provide my opinions on what those documents disclose. The documents I was asked to review include those addressed in more detail in the rest of this declaration. I provide my conclusions regarding the disclosures of these documents below.

5. I was also asked to provide my opinion on the technical feasibility of combining certain aspects of certain documents. I have offered my opinion on the feasibility of these combinations in this declaration.

6. I am not offering any conclusions as to the ultimate determinations I understand the Board will make in this proceeding. I am simply providing my opinion on the technical aspects of the documents (including, where asked, the application of what I understand Petitioner and/or the Board asserts is the appropriate construction for this proceeding) and on the motivations and

combinability of the concepts disclosed in those documents from a technical perspective.

BACKGROUND

7. I am a mechanical engineer with over 25 years of experience in research and development, product design, project management and field engineering.

8. My experience in these areas spans design of mechanical assemblies and machinery, materials and manufacturing methods, and 3-D CAD design from initial concept through final implementation.

9. As part of my experience, I have managed products from idea to design to implementation to customer installation, maintenance, and satisfaction. I have also observed and assisted with the electrical design and controls associated with automated machinery. I have extensive experience working with and the design of automated machinery and/or its components consisting of rotary bearings, linear guides or bearings, lead screws, belt drives, sensors, etc. For the last 10 years, I have been a consulting engineer working part time on automated microform scanning equipment.

10. I received my Bachelor's of Science degree in Mechanical Engineering from California State University, Chico in Chico, California in 1991.

11. Upon graduating from California State University, Chico, I was hired by NEC Electronics as an Assembly Process Engineer. In this role, I was responsible to maintain and improve high volume, semiconductor manufacturing assembly processes.

12. In 1992, I was hired by Healthtek, Inc. as a Senior Engineer. In this role, I was responsible to manage all technical aspects of high volume / low yield, disposable, medical product manufacturing.

13. In 1993, I was hired by SCP Global Technologies as a Senior Staff Engineer. In this role, I was a technical team leader of complex automation and mechanical design projects in parallel with solo design work relative to large scale semiconductor equipment manufacturing. I successfully managed and implemented a number of projects, including innovative concept generation, planning, scheduling, vendor evaluation, sub-contractor management, formal presentations, employee supervision and on time deadline completion. In this role over 11 years, I developed a number of technical strengths, including traditional engineering, finite element analysis, reliability engineering, fluids handling, chemical compatibility, airflow management, plastic part design, manufacturing engineering, design for injection molding, specification writing, creative packaging, and basic electrical and software skills.

14. In 1999, I successfully passed the Idaho State Professional Engineering examination to become a licensed Professional Engineer (PE).

15. In 1998, I formed Inventure Engineering, LLC. Inventure Engineering, LLC provides consulting engineering, design, and build services to clients worldwide. We specialize in assisting our client's new product development programs from initial concept through manufacturing. I continue to consult for clients in my role for Inventure Engineering, LLC. Petitioner is a current client of Inventure Engineering, LLC.

16. For the past 10 years I have been an engineering consultant with nextScan, Inc., a manufacturer and innovator of digital film scanning equipment. During this time, I have performed solo mechanical design work and have worked alongside teams of engineers, software programmers, and procurement and manufacturing personnel. This work has involved both roll film scanning as well as microfilm slides and film strips in jackets or aperture cards.

17. I have worked on several different designs of microform and roll film scanning equipment in consultation with nextScan. I have become intimately familiar with all aspects of microform and roll film scanning equipment, including the electrical and mechanical considerations that go into designing these devices.

18. In my career, I have been awarded 12 U.S. Patents for 5 different companies.

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