

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

COOPER CROUSE-HINDS, LLC,
Petitioner

v.

CMP PRODUCTS LIMITED,
Patent Owner.

Case No.: IPR2018-

U.S. Patent No. 8,872,027

DECLARATION OF DR. GLENN E. VALLEE, PH.D., P.E.

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I, Dr. Glenn E. Vallee, Ph.D., P.E. declare as follows:

I. INTRODUCTION

1. Based on my background, being over the age of eighteen (18), and being of sound mind, I am competent to make this Declaration.

2. Cooper Crouse-Hinds, LLC has retained me to provide my opinion on U.S. Patent No. 8,872,027 (“the ‘027 patent”) for a Declaration in support of a Petition for Inter Partes Review (“IPR”) of the ‘027 patent. The opinion set forth in this Declaration addresses the ‘027 patent, the person of ordinary skill in the art in the relevant time frame, interpretation of certain terms in the ‘027 patent, the state of the art of the ‘027 patent, the scope and content of the prior art compared to the claims of the ‘027 patent, and rationales for combining prior art elements.

3. I have reviewed and am familiar with the ‘027 patent, which issued on October 28, 2014 and was corrected by a Certificate of Correction on April 14, 2015. I understand that the application for the ‘027 patent, U.S. Patent Application No. 13/391,539 (“the ‘539 application,” Ex. 1002) was a national stage application of PCT/GB2010/050989, which was filed on June 14, 2010, and claims priority to European Patent Application No. 09168430.8 filed on August 21, 2009, European Patent Application No. 09168429.0 filed on August 21, 2009, Great Britain Patent Application 1004216.6 filed on March 15, 2010 and Great Britain Patent Application

1009450.6 filed on June 7, 2010. I have also reviewed and am familiar with the prosecution history of the '539 application and the references cited during prosecution.

4. I have reviewed and am familiar with:

- US Patent No. 7,341,255 to Babiarz *et al.* (“Babiarz”) (Ex. 1004);
- US Patent No. 5,596,176 to Everitt (“Everitt”) (Ex. 1005);
- US Patent No. 3,773,706 to Dunn Jr. (“Dunn”) (Ex. 1006);
- US Patent No. 6,852,922 to Widman (“Widman”) (Ex. 1007);
- 3M Electrical Markets Division. Product Catalogue. General Purpose Low & Medium Voltage. Resins. 1st edition March 2006 (“3M”) (Ex. 1008);
- CHICO® SpeedSeal™ Compound Fast Acting Sealing Compound Sealing Fitting Modification Kit For Use with Crouse-Hinds EYS Sealing Fittings Installation & Maintenance Information, Revision 1, March 2003 (“SpeedSeal Manual”) (Ex. 1009);
- April 2003 Chico SpeedSeal Brochure (“SpeedSeal Brochure”) (Ex. 1010);
- 2005 Material Safety Data Sheet for components of the Chico SpeedSeal Compound – Isocyanate (“2005 Isocyanate MSDS”) available at

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